

July 3, 2026

Nunavut Impact Review Board
29 Mitik Street
P.O. Box 1360
Cambridge Bay, NU X0B 0C0

Dear Members of the Nunavut Impact Review Board:

Re: Information Requests of the Inuvialuit Regional Corporation — West Kitikmeot Resources Corp. Grays Bay Road and Port Project, NIRB File No. 24XN038

Further to the Nunavut Impact Review Board's (NIRB) May 6, 2026 request to parties in the above-noted proceeding (NIRB Doc. No. 260506-24XN038), the Inuvialuit Regional Corporation (IRC) provides the enclosed Information Requests (IRs) directed to West Kitikmeot Resources Corp. (WKR) in connection with WKR's Draft Environmental Impact Statement (EIS) for the proposed Grays Bay Road and Port Project (the Project).

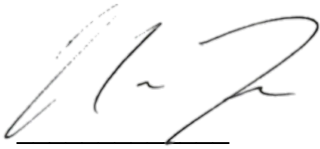
IRC represents the Inuvialuit beneficiaries of the Inuvialuit Final Agreement (IFA) and advances their rights and interests, including harvesting rights and the cultural and economic interests recognized under the IFA and protected by s. 35 of the Constitution Act, 1982. While the Project's infrastructure is situated within the Nunavut Settlement Area, the EIS identifies potential transboundary effects reaching the Inuvialuit Settlement Region (ISR), including through marine vessel traffic and the potential use of ISR ports, highways, and infrastructure. IRC's IRs address information gaps that presently prevent IRC from completing a meaningful technical review of these effects on IRC and its beneficiaries.

IRC has reviewed the IRs previously submitted in this proceeding by the Kitikmeot Inuit Association, the Kugluktuk Angoniatit Association, the Gwich'in Tribal Council, and Wildlife Conservation Society Canada. The enclosed IRs are directed to effects on the Inuvialuit that are not adequately addressed in the EIS or requested in those submissions. IRC's submission has been prepared in coordination with the Inuvialuit Game Council (IGC) to avoid unnecessary duplication.

The focused scope of IRC's IRs is not a waiver of any of its rights or interests, nor an acceptance of the methodology, assumptions, or conclusions of the EIS. IRC's decision not to raise a particular matter is not an acknowledgement that the EIS adequately addresses it. IRC reserves the right to raise additional matters and to make further submissions at the technical review phase and subsequent stages of this proceeding, including with respect to Project-related and induced marine vessel traffic within the ISR and the appropriateness of the spatial and temporal assessment boundaries applied in the EIS.

The enclosed IRs are provided in accordance with the content requirements for Information Requests set out in NIRB's *Intervenors' Guide* (February 2020). IRC looks forward to WKR's responses. Questions regarding this submission may be directed to the undersigned.

Sincerely,

A handwritten signature in black ink, appearing to read 'N. Fink', written over a horizontal line.

Niall Fink
Legal Counsel

Email: nfink@inuvialuit.com

cc. Piers Kreps, Director, Government Affairs

INFORMATION REQUEST: IRC-01

IR Source (Requesting Party)	Inuvialuit Regional Corporation
IR Directed To	West Kitikmeot Resources Corp.
Subject	Inuit participation in economic and employment opportunities.
Reference	<p>Draft Grays Bay Road and Port Project Impact Statement – Volume 1 – Main Document:</p> <ol style="list-style-type: none"> 1. "WKR's procurement and training strategies prioritize local and Inuit participation through Project employment and business opportunities." — PDF p. 40 (ES-3); PDF p. 91 (MD.2.5). 2. "Procurement Strategy will be developed and implemented to facilitate regional and Inuit business involvement, including providing first opportunity to regional and Inuit businesses, where competitive". — PDF p. 177 (MD.9.3.5); PDF p. 570 (MD.9.3.5); PDF p. 575 (MD.9.4.5). 3. "WKR will have programs and plans in place to support local Inuit employment, training, and procurement." — PDF p. 35 (NTS-10, "Employment and Economy"); PDF p. 473 (MD.2.5). <p>Draft Grays Bay Road and Port Project Impact Statement – Volume 11 – Management Plans:</p> <ol style="list-style-type: none"> 4. Appendix 37J - Inuit Human Resources and Business Development Plan (Draft) (PDF p. 385)
Issue / Concern	The references above commit West Kitikmeot Resources Corp. (WKR) to prioritizing "local," "regional," and "Inuit" participation in Project procurement, business involvement, employment, and training. The EIS does not define these terms or explain how they relate to one another. It is unclear whether "Inuit" is used solely to mean beneficiaries enrolled under the Nunavut Agreement (i.e., within the Nunavut Settlement Area), or is intended to include Inuvialuit beneficiaries and Inuvialuit businesses within the Inuvialuit Settlement Region (ISR).
Rationale	The assessment can only assess the weight given to WKR's economic participation commitments if it is clear who is eligible to benefit from them. IRC and the NIRB require the definitions and confirmation requested below to determine whether WKR's commitments to Inuit participation extend to Inuvialuit beneficiaries and businesses.

Information Request

- a) Please define "local," "regional," and "Inuit" as used in the referenced commitments, and state expressly whether each is intended to include Inuvialuit beneficiaries and businesses within the ISR.
- b) Please state whether the Labour Relations, Training, and Procurement Strategies outlined in Appendix 37J of Volume 11 extend to Inuvialuit beneficiaries. If not, please identify any commitment or mechanism that provides for Inuvialuit participation in the Project's business, employment, training, and procurement opportunities.

INFORMATION REQUEST: IRC-02

IR Source (Requesting Party)	Inuvialuit Regional Corporation
IR Directed To	West Kitikmeot Resources Corp.
Subject	Socioeconomic transboundary effects
Reference	<p>Draft Grays Bay Road and Port Project Impact Statement – Volume 10 – Additional Assessments and Conclusions:</p> <ol style="list-style-type: none"> 1. " Socioeconomic transboundary effects may occur through changes to harvested wildlife availability, cross-border worker travel, community health dynamics, shifts in employment and income distribution, and increased demand on infrastructure such as the TCWR, health and emergency services in Yellowknife, and regional transportation networks. Although these effects may involve both adverse and positive outcomes, the Project includes mitigation measures and management plans aimed at reducing adverse influences and supporting adaptive management over the project life.... 2. [T]he majority of transboundary effects are predicted to be low in magnitude and manageable with planned mitigation, monitoring, and ongoing engagement with Kitikmiut, other Indigenous groups and other potentially affected communities. " — PDF p. 8 (VS.10.3).
Issue / Concern	<p>The basis for WKR's conclusion that the majority of transboundary effects will be low in magnitude is not clear. There is no information to identify what changes were considered with respect to harvested wildlife availability, cross-border worker travel, community health dynamics, shifts in employment and income distribution, and increased demand on infrastructure. Any impacts or changes to harvested wildlife availability are subject to Section 13 of the Inuvialuit Final Agreement.</p> <p>The draft EIS does not identify how significance thresholds for transboundary effects were set, what scenarios were assumed, or which effects are not included in this conclusion. It is also not clear which, if any, effects are anticipated to occur in the Inuvialuit Settlement Region, or whether socioeconomic effects on Inuvialuit communities were considered at all among transboundary effects.</p>
Rationale	Understanding assumptions, significance thresholds, and geographic scope is essential to assess the weight to be given to WKR's conclusion regarding the magnitude of transboundary

	<p>effects. Without further information, IRC is unable to evaluate whether the transboundary socio-economic effects assessment adequately addresses the ISR or propose mitigations to reduce impacts to Inuvialuit.</p>
Information Request	<ul style="list-style-type: none">a) For each socio-economic transboundary effect listed (changes to harvested wildlife availability, cross-border worker travel, community health dynamics, shifts in employment and income distribution, and increased demand on infrastructure), please identify any specific changes within the ISR that were assessed in reaching the conclusion on magnitude.b) Volume 11 includes a draft Socio-economic Monitoring Plan (SEMP) at Appendix 37K, which addresses "effects that are directly attributable to the Project and related to the Project's workforce." Please confirm whether any transboundary socio-economic effects fall within the SEMP or any other management plan and, if so, identify any monitoring and mitigation measures applicable to the ISR.c) If such effects fall outside the SEMP, explain how WKR proposes to monitor and mitigate transboundary socio-economic effects, including effects within the ISR, and describe whether and how Inuvialuit communities and IRC will be included in the design and delivery of that monitoring and mitigation.

INFORMATION REQUEST: IRC-03

IR Source (Requesting Party)	Inuvialuit Regional Corporation
IR Directed To	West Kitikmeot Resources Corp.
Subject	Use of lands and ports within the Inuvialuit Settlement Region
Reference	<p>Draft Grays Bay Road and Port Project Impact Statement – Volume 1 – Main Document:</p> <ol style="list-style-type: none">1. “While project infrastructure is located entirely within the Kitikmeot Region of the NSA, the Project does have the potential to result in transboundary effects related to the following: Physical activities that cross the NSA boundary (e.g., marine vessel routes connecting to Quebec, Inuvik, or Tuktoyaktuk...” — PDF p. 192 (MD.10.3).2. "The number, location, and size of laydown areas will be confirmed as design of the Project progresses and as third-party users' needs are confirmed." — PDF p. 44 (ES-7, "Material and Equipment Management"). <p>Draft Grays Bay Road and Port Project Impact Statement – Volume 2 – Introduction, Project Description, and Alternatives:</p> <ol style="list-style-type: none">3. "Barging from Hay River, Inuvik, or Tuktoyaktuk to Grays Bay could be utilized as an alternative option to supply certain equipment or materials that are more readily available in western Canada, or to reach Grays Bay in advance of the first sealift from Quebec. Around three barges per year may be required from pre-construction (2029) through construction (2030-2034) and into operations and maintenance (2035 onwards)." — PDF p. 73 (Section 2.6.2.4).4. "Barge cargo will be prioritized to load at Hay River, but if necessary (e.g., due to low water levels on the Mackenzie River), it will be staged and loaded at the Ports of Inuvik or Tuktoyaktuk. Each barge staged at Inuvik or Tuktoyaktuk will require around 45 truckloads to travel through the Inuvialuit Settlement Region (ISR) from the Yukon border to existing staging facilities at those ports. These trucks will arrive in Inuvik or Tuktoyaktuk from approximately April to July, and materials and equipment will be staged at existing facilities in Inuvik or Tuktoyaktuk." — PDF p. 73 (Section 2.6.2.4).

<p>Issue / Concern</p>	<p>The draft EIS frames the Project's reliance on ISR ports and logistics as contingent, but lacks information to assess the likelihood of this contingency. It is not clear at what scale Project activity, workforce, fuel supply, or infrastructure would occur in the ISR if triggered; or whether use of ports, laydown areas, and labour in the ISR has been considered in the assessment of transboundary effects or excluded from the EIS.</p>
<p>Rationale</p>	<p>Without a full understanding of what would trigger reliance on ports and roads in the ISR, the scale of the resulting activity and infrastructure, and whether the effects of that activity were assessed or scoped out, IRC and the NIRB cannot determine whether the Project's activity and effects in the ISR have been assessed, or what mitigation may be required.</p>
<p>Information Request</p>	<ul style="list-style-type: none"> a) Please identify all circumstances, including any circumstances not identified above, that would require reliance on Inuvik and Tuktoyaktuk as transportation hubs, and explain when, and on what basis, that determination would be made. Please provide an assessment of the likelihood of any such circumstances occurring, including any information relevant to the likelihood that equipment and materials would be sourced in western Canada. b) Please clarify whether effects on community health, employment and income distribution, and demand on infrastructure and services from the above-noted activities were included in WKR's assessment of transboundary socio-economic effects. c) The spatial boundaries for the Infrastructure and Services VC (Section 28.1.4.1) include Yellowknife because it "will serve as a logistics and staging location for the Project," but exclude the use of Inuvik or Tuktoyaktuk for staging. Please explain why staging at Inuvik and Tuktoyaktuk did not warrant inclusion within the VC's assessment boundaries, and under what circumstances WKR would bring them within the assessment scope. d) At what point in the Project timeline would the decision to use transportation through the ISR be finalized, and when would WKR commit to notifying IRC of that determination?

INFORMATION REQUEST: IRC-04

IR Source (Requesting Party)	Inuvialuit Regional Corporation
IR Directed To	West Kitikmeot Resources Corp.
Subject	Project use of, and effects on, the Inuvik–Tuktoyaktuk Highway and ISR road network
Reference	<p>Draft Grays Bay Road and Port Project Impact Statement – Volume 10 – Additional Assessments and Conclusions:</p> <ol style="list-style-type: none"> 1. "If materials are shipped by barge from Inuvik or Tuktoyaktuk during Construction, then it is estimated that approximately 135 trucks/year will travel through the ISR from the Yukon border. Given current traffic volumes on the TCWR and the ISR highways, the addition of project-related vehicles is limited and transboundary effects from Project vehicles are considered negligible." — PDF p. 96 (Section 33.4.1). 2. "Each barge (up to 3 per year of construction) will require around 45 truckloads to travel through the ISR from the Yukon border to existing staging facilities at those ports. These trucks will arrive in Inuvik or Tuktoyaktuk from approximately April to July..." — PDF p. 112 (Section 33.5.5).
Issue / Concern	<p>The EIS estimates potential traffic volumes of 135 trucks/year through the Inuvialuit Settlement Region (ISR), but does not assess the effects of that traffic on the ISR road network, including the Inuvik–Tuktoyaktuk Highway (ITH) and the Dempster Highway.</p> <p>The conclusion that effects are "negligible" is not supported by reference to the current or approved capacity of those roads, their maintenance regime, or gravel resupply and is inconsistent with IRC's views and prior experience of increased traffic demands on the ITH.</p>
Rationale	<p>Gravel is a constrained resource in the ISR, and its supply for regional needs is the subject of a joint forecasting obligation between the Inuvialuit Land Administration and the responsible government authority under the Inuvialuit Final Agreement (s. 7(27)). Increased ITH use imposes additional maintenance demand, principally including the placement of gravel.</p> <p>Without a clear understanding of potential traffic volumes or an impact analysis for highways within the ISR, IRC and the NIRB cannot assess the effect on infrastructure in the region or assess</p>

	the conclusion that transboundary traffic effects are properly characterized as “negligible.”
Information Request	<ul style="list-style-type: none">a) Please identify the "current traffic volumes... on the ISR highways" relied on for the conclusion that transboundary effects from Project vehicles are "negligible". The Infrastructure and Services baseline (Volume 9, Section 28.2.2.3) describes traffic volumes and approved capacity for the TCWR only. If no ISR highway traffic or capacity data was relied on, please explain how the conclusion was reached without it.b) Please explain how the conclusion in Section 33.4.1 that Project-related vehicle effects on the “ISR highways” are “negligible” was reached, including any traffic volume or capacity information considered for the ITH and other ISR highways. If no such information was available or relied on, please identify the basis for the conclusion.c) Please identify whether any Project-related or reasonably foreseeable induced increase in traffic on the ITH or other roads within the ISR was assessed, and if so, where. If not assessed, please explain the basis for the assumption that RFI activity will result in "minimal, if any" traffic on ISR roads (Section 33.4.1).