



June 30, 2026

Kelli Gillard
Manager Impact Assessment
Nunavut Impact Review Board
PO Box 1360
Cambridge Bay NU X0B 0C0

Via Email: info@nirb.ca

RE: Government of Canada Response to NIRB call for Information Requests (IRs) for West Kitikmeot Resources Corp.'s "Grays Bay Road and Port" project proposal (NIRB File No. 24XN038).

Dear Kelli Gillard,

On May 6, 2026, the Nunavut Impact Review Board (NIRB) issued its conformity determination confirming that the Impact Statement submitted by West Kitikmeot Resources Corp. (WKR) for the "Grays Bay Road and Port" project proposal (NIRB File No. 24XN038) meets the requirements of the applicable guidelines and has initiated the public technical review phase.

As part of this process, NIRB has invited parties to submit Information Requests (IRs) to identify information gaps or areas requiring clarification within the Impact Statement to support the technical review. Submissions of IRs are to be provided to the NIRB by July 03, 2026.

The Northern Projects Management Office (NPMO) of the Canadian Northern Economic Development Agency has coordinated and consolidated IRs from Government of Canada departments into a single submission, attached herein, with IRs grouped by department. NPMO is coordinating this response on behalf of the Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC), Environment and Climate Change Canada (ECCC), Fisheries and Oceans Canada (DFO), Health Canada (HC), Natural Resources Canada (NRCan), and Transport Canada (TC). The NPMO would be happy to answer any questions to clarify or improve understanding of the IRs, thereby enhancing the efficiency and effectiveness of the review process.

As a general comment, the Government of Canada notes an inconsistency in the Impact Statement. WKR currently indicates that the Port facilities will only be used during the open water season; this premise is provided as rationale for certain assessment considerations. This seemingly differs from previous information provided by WKR and is inconsistent with assertions that the project would enable year-round use and accommodate a broader range of marine operations and users. Capacity estimates associated with these potential uses are also not provided in the Impact Statement. This inconsistency makes it difficult to appropriately assess the potential impacts and benefits of the project.

The Government of Canada looks forward to continued communication and participation in the NIRB review process. Please direct any questions, comments or correspondence to Aminul Haque, Senior Project Manager, at Aminul.Haque@cannor.gc.ca or 867-222-1022.



Sincerely

Adrian Paradis

Project Director
Northern Projects Management Office
Canadian Northern Economic Development Agency

Cc Spencer Dewar, Regional Director General, Nunavut Region, Crown-Indigenous Relations and Northern Affairs Canada

Jody Small, Regional Director, Prairie and Northern Region, Environmental Protection, Operations Directorate, Environment and Climate Change Canada

Deborah Yu, Director General, Explosives, Regulatory and Business Services Branch, Lands and Minerals Sector, Natural Resources Canada

Duwayne Williams, Regional Director General, Ontario, Prairie and Northern Region, Transport Canada

Miranda MacPherson, Director, Chemicals and Environmental Health Management Bureau, Healthy Environments and Consumer Safety Branch, Health Canada

Andrew Randall, Regional Director, Aquatic Ecosystems, Arctic Regions, Fisheries and Oceans Canada



Government of Canada Information Requests

IR Source:	Government of Canada
IR Number:	GC-IR 01
IR Directed to:	Proponent
Subject:	Ice-breaking
Reference:	NIRB document 352119 Impact Statement, Volume 1, Page EA-2 Impact Statement, Volume 6, Pages 16-18 and 16-129 Impact Statement, Volume 8, Page 23-107
Issue/Concern:	<p>Throughout the Impact Statement, the Proponent indicates that the Port facilities will only be used during the open water season. For example, “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.” This premise has been used as rationale for certain assessment considerations, including with respect to marine mammal disturbance and potential interactions with island caribou.</p> <p>These statements differ somewhat from previous Proponent information on this topic, which indicated that, “The Port facility is expected to be open year-round and... will additionally be made available for docking by third-party vessels that have obtained necessary approvals – outside of this application – to travel during the ice season.”</p> <p>These statements also appear to differ somewhat from others in the Impact Statement, which indicate that the Project enables a “year-round” strategic presence in the region, with the capability of berthing and resupplying, “...Coast Guard ships, Royal Canadian Navy Offshore Patrol Ships, Canadian Patrol Submarines, and Polar Icebreakers.”</p> <p>Such inconsistencies make it difficult to assess the potential impacts and benefits of the Project. If the Port is open year-round and may be available to ice-breaking vessels outside the open water season, consideration of ice-breaking is required in the assessment of potential cumulative effects.</p>
Information Request:	To support Technical Review, the Proponent should conclusively confirm whether ice-breaking associated with use of the Port facilities may occur. If so, additional cumulative effects assessment is required for relevant Valued Components. If not, limitations regarding the use of Project components (in terms of Project purpose and benefits) should be clarified.

IR Source:	Government of Canada
IR Number:	GC-IR 02
IR Directed to:	Proponent
Subject:	Caribou Cumulative Effects Assessment
Reference:	Impact Statement, Volume 6, Pages 16-1 and 16-127
Issue/Concern:	The Proponent has assessed impacts to the Bathurst and Dolphin-and-Union herds as “representative” of mainland and island caribou, respectively. While these herds are likely to be the most impacted, there



	<p>may nonetheless be impacts to other herds, particularly with respect to cumulative effects.</p> <p>Further, the Proponent's assessment methodology with respect to cumulative effects on caribou is non-comprehensive. Functionally, the Proponent has only assessed cumulative effects within the BCH-RAA1 and DUH-RAA areas. This has resulted in the exclusion from consideration of cumulative interactions with other relevant projects/activities that may affect caribou herds, such as the Arctic Economic and Security Corridor.</p>
Information Request:	<p>To support Technical Review, additional assessment or rationale for exclusion should be provided by the Proponent with respect to other potentially affected herds, such as the Bluenose-East and Beverly/Ahiak. It is insufficient for the purposes of Technical Review to only state that such herds, "...interact infrequently with the Project; however, when they do, their space use and movements are similar to those of the BCH."</p> <p>Further, the Proponent should update their spatial scope of assessment for caribou cumulative effects to ensure that reasonably foreseeable and reasonably foreseeable induced activities are appropriately considered, and not excluded from assessment based on non-biologically-relevant boundary restrictions, such as the Nunavut-Northwest Territories border.</p>

IR Source:	Government of Canada
IR Number:	GC-IR 03
IR Directed to:	Proponent
Subject:	Costs and Liability
Reference:	Impact Statement, Volume 1, Pages NTS-4, MD-12, MD-22, and A-54 Impact Statement, Volume 2, Page 2-20
Issue/Concern:	The Proponent estimates the current construction cost for the Project to be \$1.2B. It is unclear what the annual operating/maintenance costs of the Project would be thereafter. This information is required to support Technical Review, particularly given the Proponent has indicated that they have no plans for closure and reclamation of Project components considered permanent infrastructure. Further, the Proponent indicates that they expect, "...a government entity will assume long-term responsibility – and ultimate liability – prior to construction."
Information Request:	To support Technical Review, the Proponent should provide an estimate of the Project's annual operating/maintenance costs and clarify its expectations regarding a government entity assuming liability.

IR Source:	Government of Canada
IR Number:	GC-IR 04
IR Directed to:	Proponent
Subject:	Road Use Transboundary Effects Assessment
Reference:	MVEIRB Supplemental Transboundary Report, Page 9 NIRB Final Scope List, Page 6 Impact Statement, Volume 10, Page 33-13 GNWT Highway Traffic Report (2023), Page 21
Issue/Concern:	Both NIRB's Final Scope List and MVEIRB's Supplemental Transboundary Report request that road use estimates be included in the Impact



	<p>Statement with respect to transboundary impacts. The Proponent provides road use estimates in the context of transboundary effects on air quality only, noting that, “During Construction, approximately 1000 truckloads/year will utilize the TCWR” and that, “given current traffic volumes on the TCWR [...], the addition of project-related vehicles is limited and transboundary effects from Project vehicles are considered negligible.”</p> <p>Of note, the GNWT’s Highway Traffic Report (2023) indicates between approximately 6000-9000 annual truckloads (one-way) on the TCWR for the period 2014-2024. Given the closure of diamond mines in the region in the coming years, use of the TCWR will be greatly diminished, and traffic related to the construction of the Project will likely account for a far greater proportion of total traffic volume. The Proponent’s estimate of 1000 truckloads/year for the Project may very well represent a significant proportion of total traffic along the TCWR during the construction phase.</p>
Information Request:	To support Technical Review, the Proponent should provide additional rationale regarding why anticipated TCWR use during construction is considered “negligible” and why road use estimates were not considered further in assessing transboundary effects for other Valued Components (e.g., caribou).

IR Source:	NRCan and CIRNAC
IR Number:	GC-IR 05
IR Directed to:	West Kitikmeot Resources Corp.
Subject:	Geotechnical and Permafrost Characterization, Thermal Preservation, and Historical Design Bases
Reference:	Volume 1, Appendix B (Mitigations and Commitments) Volume 2, Section 2.6.2.4 Volume 3, Section 8 (Knowledge and Literature Cited) Volume 6, Section 14 (Assessment of Potential Effects on Terrain, Soils, and Permafrost); 14.2.2.5, Appendix 14A Section 3,4, Appendix B, E Volume 9, Appendix 26A (Human Health and Ecological Risk Assessment) Volume 10, Section 35 (Effects of the Environment on the Project)
Issue/Concern:	<p>The Impact Statement relies on geotechnical mitigation measures (such as preserving the ground thermal regime and active layer preservation) without defining the standards, procedures, or industry best practices used to plan future field programs. Current information indicates residual uncertainty in subsurface characterization, which limits the ability to evaluate thaw settlement and embankment stability risk assessments (section 35). Additionally, historical design parameters from the BGC Engineering (2013) report for the Izok corridor were not provided with the Impact Statement, leaving the engineering basis for the current road design unverified. The Impact Statement also indicates that environmental baseline, geotechnical, and geophysical field programs were undertaken to support Project planning and design, but the related reports, supporting datasets, and baseline soil quality information are not clearly provided, limiting review of the technical basis for current assessments and design assumptions.</p> <p>The Proponent has summarized existing information on terrain conditions, including information from geotechnical borehole logs and ground</p>



	<p>temperature measurements (Vol 6, App. 14A). Data sources include geotechnical investigations conducted between 2002 and 2012 associated with resource development projects, as well as data compilations and landform mapping done by the Geological Survey of Canada. Terrain mapping has also been conducted by the Proponent (App. E in App. 14A). The location of boreholes and the associated geotechnical and/or ground temperature information obtained from them, is clustered in specific locations with limited investigations conducted along the proposed road alignment. In addition, there are no recent ground thermal data presented. Additional geotechnical investigations, including more recent ground thermal data, are required to better understand terrain stability conditions along the proposed route, inform project design, and to ensure potential environmental effects are minimized. It is understood that site specific investigations are not normally done at the early design stage. However, clarification is required regarding any recent geotechnical investigations the Proponent has conducted or planning to conduct to improve assessment of terrain conditions, particularly in critical sections of the alignment (e.g., slopes and approaches to water crossings).</p>
<p>Information Request:</p>	<p>Provide comprehensive Geotechnical and Thermal Engineering Designs addressing the following:</p> <ul style="list-style-type: none"> • Identify the industry procedures, standards, and best practices that will be followed for the planning, execution, and reporting of the geotechnical investigation program. • Detail the guidelines, standards, and best practices used to develop permafrost protection measures, preserve ground thermal regimes, and manage vegetation or surface organics removal, alongside a verification monitoring program. • Clarification regarding any recent geotechnical investigations conducted along the road alignment, including collection of more recent ground thermal data (volume 6). • Reference all geotechnical investigations completed to date, explain how they informed the current impact assessments and siting decisions, and provide a clear outline of future planned investigations (methods, general locations). • Information on plans for additional geotechnical investigations to inform project design and environmental management and monitoring plans (volume 6). • Describe how subsurface uncertainty (including thaw settlement and slope failures) will be systematically managed through studies and adaptive management. • Provide a copy of the BGC Engineering Inc. (2013) report on geotechnical design criteria for the Izok corridor project, describe how it was used to inform the current design, and confirm if its assumptions remain applicable under contemporary climate horizons. <p>Provide available reports, summaries, and accessible datasets from the 2024 and 2025 environmental baseline, geotechnical, geophysical, and soil quality field programs, including baseline soil quality information for the proposed development area (including relevant Jericho Mine Site areas),</p>



	describe how this information informed the Project description, design, and assessments, and confirm whether additional field programs or baseline studies were completed but not described in the Impact Statement.
IR Source:	ECCC, DFO, and NRCan
IR Number:	GC-IR 06
IR Directed to:	Proponent
Subject:	Dredging during Operations and Maintenance phase
Reference:	<p>Grays Bay Road and Port Impact Statement (April 2026)</p> <p>Volume 5</p> <ul style="list-style-type: none"> - Section 12.1 - Section 12.3 - Appendix 12A-5.9) <p>Volume 8 Marine Environment</p> <ul style="list-style-type: none"> - Section 21.3.2.2 Project Effects Pathways - Section 21.3.2.4 Project Residual Effect - Section 21.3.6.1 Key Findings - Section 21.3.6.2 Summary of Effects of Climate Change on Marine Water and Sediment - Section 23 - Appendix 21A Marine Water and Sediment Quality Baseline Report <ul style="list-style-type: none"> o Section 5.1: Oceanography
Issue/Concern:	<p>Dredging will be required during the port construction, as discussed in Section 21.3.2.2. Dredging to create navigable channels for medium and large vessels is also proposed as a potential impact to the marine environment. However, no projections on spatial extent or marine environment impacts from dredging navigable channels are provided, due to a lack of data collected thus far. Additionally, the Impact Statement states “<i>No dredging is anticipated during the Operations and Maintenance phases.</i>”</p> <p>This is unexpected given operations are proposed to continue indefinitely and sediments deposited over time could make dredging necessary to maintain safe vessel access to port facilities. In particular, as noted in the Project Impact Statement:</p> <ul style="list-style-type: none"> • The Project-specific Inuit Knowledge report includes several observations of lowering sea levels; • The nearby Kennarctic River “<i>heavily influences water quality and stratification within Grays Bay. Freshwater runoff from the river further decreases salinity at the surface and introduces suspended sediments into the marine environment.</i>”, and • Climate change has the potential to “<i>alter sediment deposition patterns, increase turbidity, and affect marine habitat conditions</i>”. <p>Many port facilities occasionally require maintenance dredging, and if this will be the case at Grays Bay, the dredging and disposal methods of</p>



	<p>dredged materials, as well as necessary mitigation measures, should be considered in the environmental assessment.</p> <p>The Proponent considers a range of relative sea level projections developed and now published by NRCan (Brierly-Green and James, 2026) and indicates that depending on the choice of projection, relative sea level could continue to fall, stabilize, or begin to rise, potentially rapidly (5- App. 12A-5.9). This presents a design challenge of considerable importance in planning future wharf elevations and under-keel clearance. For the dredging that may occur in navigation channels, it is not clear for which sea level projection(s) the Proponent is planning.</p> <p>Reference: Brierley-Green, C. & James, T. S. (2026). Relative sea-level projections for Canada based on the IPCC Sixth Assessment Report and the NAD83v70VG national crustal velocity model. <i>Geological Survey of Canada, Open File</i>, 9337, 17. Natural Resources Canada. https://doi.org/10.4095/pdmpu1k9ep</p>
<p>Information Request:</p>	<p>ECCC requests that the Proponent provide the following information:</p> <ul style="list-style-type: none"> - discuss the information that led to the conclusion that the possible sources of sediment to the marine environment and sea level changes will not create a need for dredging during the Operations phase of the Project; and - if maintenance dredging around the port facilities is a possibility during Operations, present a description of the dredging method (including timing and spatial extent), proposed disposal location for material, mitigation measures, and estimated frequency of occurrence. <p>NRCan requests that the Proponent provide:</p> <ul style="list-style-type: none"> - clarification on strategy and rationale for selecting the sea level projection (or projections) to be used in determining elevations of infrastructure and depths of berths and navigation channels. <p>DFO requests the Proponent provide details on the proposed dredging activities associated with the creation and maintenance of navigable channels, including:</p> <ul style="list-style-type: none"> - whether in-water blasting (or other in-water works) may be required to support dredging of navigable channels; and - the potential impacts to marine mammals and marine fish and fish habitat, including the cumulative effects, caused by project activities associated with dredging for navigable channels
<p>IR Source:</p>	<p>HC and DFO</p>
<p>IR Number:</p>	<p>GC-IR 07</p>
<p>IR Directed to:</p>	<p>West Kitikmeot Resources Corp.</p>
<p>Subject:</p>	<p>Subsistence Harvesting Locations within the Local and Regional Assessment Area</p>
<p>Reference:</p>	<p>1. Guidelines for the Preparation of an Impact Statement for West Kitikmeot Resources Corp's Gray's Bay Road and Port Proposal – January 30, 2026</p>



	<ul style="list-style-type: none"> a. Section 8.2.6.1 – Traditional Activity and Knowledge, Baseline Information, PDF p.92 2. Impact Statement Volume 7, Section 20, Page 20-51 3. Impact Statement Volume 8, VS. 23.2.2.1, Page 23-16 4. Impact Statement Volume 9 – Human Environment <ul style="list-style-type: none"> a. Figure 24.1 – Traditional Land, Marine, and Resources Use LAA and RAA Overview, PDF p. 165 b. Section 24.2.2 - Assessment of Potential Effects on Traditional Land, Marine and Resource Use, Overview, PDF p. 174-232 c. Table 24.2 – Summary of Inuit, Indigenous, and Community Knowledge and Engagement Feedback, PDF p. 178-184 5. Impact Statement Volume 9 – Human Environment, Appendix 26A - Human Health and Ecological Risk Assessment <ul style="list-style-type: none"> a. Section 4.1.2.5 – Traditional Country Foods, page PDF p. 1131 b. Section 4.1.1 – Human Receptors and Locations, PDF p. 1116-1119
<p>Issue/Concern:</p>	<p>Guideline 8.2.6.1 of the Guidelines for the Preparation of an Impact Statement for West Kitikmeot Resources Corp's Gray's Bay Road and Port Proposal requires baseline information for Traditional Activity and Knowledge, including: "Descriptions, including maps, of traditional and current hunting ranges and patterns in the Local Study Area." While the Government of Canada acknowledges the narrative information provided in the Impact Statement (IS) in Section 24.2.2 on historical and current Traditional Land, Marine, and Resource Use (TLMRU) for potentially impacted Inuit and Indigenous groups, complementary maps identifying representative traditional or subsistence harvesting locations were not provided. The Inuit, Indigenous, and Community Knowledge and Engagement Feedback section of the baseline conditions description identified locations of cultural and ecological importance, but locations were not mapped, nor was there a description of the Proponent's integration of this information into the project design.</p> <p>The assumption that traditional or subsistence harvesting (e.g., hunting, fishing, gathering, etc.) occurs throughout the region may be considered a conservative approach, but a more precise identification of key areas within the Local Assessment Area (LAA) and Regional Assessment Area (RAA) (including the near-field marine environment, as shown in Figure 24.1 of the IS) would enable more targeted and efficient monitoring and mitigation, and better support technical review. This information may also help address concerns shared by communities about the potential impacts of the project on harvesting (e.g., Volume 9, Table 24.4) and would be consistent with the guideline requirements to consider priority issues raised by potentially impacted communities.</p> <p>An assessment of the impacts of Project activities on identified harvesting, hunting, and fishing locations should also be completed. This assessment should include direct impacts on hunting/fishing through decreased</p>



	presence or populations of marine mammals and fish in the LAA and RAA, as well as impacts on access to harvesting, hunting, and fishing locations by Project activities caused by the controlled access to the port and road during construction and operations. A discussion on how these locations were incorporated into project design should also be included.
Information Request:	<p>To support Technical Review, the IS should identify locations of cultural importance for hunting and fishing as identified by local Inuit and Indigenous communities within the Project area. Locations of ecological importance, as identified by Inuit and Indigenous consultation, should also be identified. Additionally, the IS should include an assessment of the potential impacts to harvesting, hunting, fishing, and ecological functions (such as migration, spawning, rearing, nursing, feeding, etc.) at the identified locations.</p> <p>The baseline description and assessment should include:</p> <ul style="list-style-type: none"> i) description (including mapping) of terrestrial, freshwater, and marine harvesting locations within the LAA and RAA (representative of locations identified by local Inuit and Indigenous communities); and, ii) discussion on whether additional considerations were made for locations of cultural and/or ecological importance, how this information was incorporated into project design, and what avoidance and mitigation measures will be implemented to reduce impacts on these locations.

IR Source:	DFO and ECCC
IR Number:	GC-IR 08
IR Directed to:	Proponent
Subject:	Aquatic Effects Monitoring Program
Reference:	<p>Grays Bay Road and Port Impact Statement (April 2026) Volume 11 Management Plans</p> <ul style="list-style-type: none"> - Appendix 37D - Aquatic Effects Management Plan - Section 2. Aquatic Effects Monitoring Programs
Issue/Concern:	<p>The draft Aquatic Effects Management Plan (AEMP) provided in Volume 11 includes both the marine environment and the freshwater environment in a single plan. Marine and freshwater monitoring programs are often presented separately, as they are required under separate jurisdictions, include monitoring of different organisms, and require comparison of results to different benchmarks.</p> <p>The draft AEMP is presented largely as an outline indicating where future information will be provided, but it lacks sufficient detail to properly evaluate its effectiveness in detecting, evaluating, and managing Project-related impacts. Given that monitoring is critical to the success of mitigation measures, the lack of detail raises concerns over the Proponent's ability to monitor and respond to potential effects during the Construction and Operations phases. Key details are not included, such as clearly defined monitoring endpoints, spatial and temporal design, thresholds for action, and data interpretation methods. These details are needed to assess the</p>



	<p>effectiveness of proposed monitoring and mitigation measures and to ensure protection of aquatic ecosystems through the life of the Project.</p> <p>The proposed monitoring programs also include several differences between the Construction and Operations phases, however in some cases the rationale for these differences is unclear. For example, the marine monitoring program proposes analysis of effluent characteristics in the Operations phase, presumably related to discharge from a permanent outfall pipeline, but not during Construction, when a temporary discharge pipeline will be implemented.</p> <p>The marine program also proposes to monitor underwater noise during Construction but not during Operations, even though noise-generating activities (i.e. shipping) will continue and potentially even increase during the Operations phase.</p> <p>Lastly, the freshwater monitoring program proposes to monitor the effectiveness of mitigation measures (water intake screens, erosion and sediment control measures, and fugitive dust mitigation) during Construction, but not during Operations. It is unclear why these mitigation measures would not be monitored during the Operations phase.</p>
<p>Information Request:</p>	<p>DFO and ECCC request that the Proponent:</p> <ol style="list-style-type: none"> 1. Provide separate draft monitoring plans for the freshwater environment and the marine environment; 2. Provide updated marine and freshwater AEMP's that include project-specific details on proposed monitoring. This should include monitoring endpoints and objectives, sampling design, methodology and analysis, action levels, and adaptive management; and 3. If the updated AEMPs include exclusions for monitoring of project effects that are expected to occur across both the Construction and Operations phases, please provide a rationale for these exclusions.

Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC)

IR Source:	CIRNAC
IR Number:	CIRNAC-IR 01
IR Directed to:	West Kitikmeot Resources Corp.
Subject:	Climate design basis for Project infrastructure
Reference:	<p>Volume 2, Project Description (Project design and infrastructure descriptions)</p> <p>Volume 5, Climate (including sea level, waves, and ice conditions)</p> <p>Volume 10, Section 35 (Effects of the Environment on the Project)</p> <p>Volume 1, Appendix B (Mitigations and Commitments)</p>
Issue/Concern:	The Impact Statement presents climate information, Project infrastructure descriptions, and mitigation commitments; however, it does not clearly define the design basis linking environmental and climate conditions to



	<p>infrastructure design, including design parameters, return periods, and incorporation of future climate scenarios.</p> <p>Specifically, the Impact Statement does not define:</p> <ul style="list-style-type: none"> • The environmental design conditions (e.g., extreme water levels, waves, ice) used to inform infrastructure design. • The return periods or scenarios considered (including future climate conditions). • How climate change projections have been incorporated into design assumptions. <p>While Appendix B includes commitments to apply best practices and consider climate conditions, these commitments are expressed at a high level and do not provide detail to understand the engineering design basis. Clarification of the design basis is important to evaluate the following:</p> <ul style="list-style-type: none"> • Assessment of climate risks is consistent with the proposed mitigation and design approach • Effectiveness of mitigation measures and the likelihood of adverse effects.
Information Request:	<p>Please provide clarification of the following:</p> <ol style="list-style-type: none"> 1. Key environmental design parameters (e.g., water levels, waves, ice). 2. Design events/return periods and applied climate scenarios, including future conditions and time horizons. 3. How climate information (Volume 5) has informed infrastructure design (Volume 2). 4. How mitigation commitments (Appendix B) have been incorporated into design, including any additional design criteria. 5. Identification of any outstanding design elements and how uncertainty in climate projections will be addressed.

IR Source:	CIRNAC
IR Number:	CIRNAC-IR 02
IR Directed to:	West Kitikmeot Resources Corp.
Subject:	Terrain Stability, Quarry Operations, and Unique Landform Avoidance
Reference:	Volume 1 – Appendix B: Mitigations and Commitments
Issue/Concern:	The proponent commits to developing Quarry/Borrow Pit and Road Construction Management Plans, as well as avoiding unique landforms where possible. However, the guidelines, standards, and monitoring approaches for permafrost protection at aggregate sources are not described, and no operational definitions or localization methods are provided for identifying unique landforms. This limits the ability to assess how sensitive landforms will be identified, avoided, and monitored, including in relation to permafrost protection.
Information Request:	<p>Please provide a Terrain and Material Extraction Management Framework addressing the following:</p> <ol style="list-style-type: none"> 1. Identify the guidelines, standards, and best practices that will be used to develop the Borrow Pit and Quarry Management Plans and the Road Construction Management Plans.



	<ol style="list-style-type: none"> 2. Provide explicit, operational definitions and localization methods (including mapping) for unique landforms (such as kames, eskers, and moraines) within the project footprint. 3. Describe how unique landform avoidance is integrated as a design consideration in road alignment and quarry design, and specify the monitoring activities that will verify permafrost controls.
--	--

IR Source:	CIRNAC
IR Number:	CIRNAC-IR 03
IR Directed to:	West Kitikmeot Resources Corp.
Subject:	Integrated Water-Wastewater Balance, Dilution Modeling, and Spill Contingency
Reference:	<p>Volume 2: Page 2-47 (text)</p> <p>Volume 2: Table 2.18 (Proposed Treated Sewage Effluent Discharge Quality Criteria)</p> <p>Volume 8: Section 21.3.2 (Change in Marine Water Quality)</p> <p>Volume 10: Section 34 (Accidents and Malfunctions)</p>
Issue/Concern:	<p>Several discrepancies, gaps, and unresolved assumptions exist across the project's water supply, waste treatment, and outfall models. Specifically, potable water demand varies from 120 to 500 L/d per person, and wastewater generation (60 L/d per person) does not balance with these demands. The marine dilution model uses an effluent TSS of 120 mg/L, which contradicts the stated commitment to match federal Wastewater Systems Effluent Regulations (WSER) targets of 25 mg/L. Furthermore, grey water handling remains undefined, terrestrial sump or lagoon impacts are unassessed, and accident assessments omit truck-transported wastewater spill risks, marine outfall failures, treatment bypass events, and drinking water plant malfunctions.</p>
Information Request:	<p>Please provide clarification on the following:</p> <ol style="list-style-type: none"> 1. Resolve the potable water demand discrepancies (120 L/d vs 500 L/d) and reconcile sewage flow rates, trucking frequencies, and dilution calculations in a consistent project water balance. 2. Provide the exact target effluent concentrations, explaining the contradiction between Table 2.18 (120 mg/L TSS) and WSER expectations (25 mg/L). 3. Clarify how grey water will be managed, define the design parameters of terrestrial sumps, and provide an assessment of biophysical impacts to terrestrial and freshwater environments if lagoons/wetlands are utilized. 4. Clarify the assumptions used for desalination brine salinity and combined effluent discharge rates in the dilution assessment, and update the assessment if required. 5. Assess risk, likelihood, and biophysical consequences of wastewater spills during truck transport (including construction capacity validations of existing infrastructure) and marine outfall malfunctions. 6. Assess the environmental impacts of a temporary or total failure of the potable water treatment system.

IR Source:	CIRNAC
IR Number:	CIRNAC-IR 04



IR Directed to:	West Kitikmeot Resources Corp.
Subject:	Hydrology, Ice and Permafrost
Reference:	Volume 1: Main Document, Appendix A (Concordance Table) Section 8.1.6, 8.1.6.1, 8.1.6.2 Volume 7: Section 19.2 (Baseline Conditions) Section 19.3.2 (Change to Surface Water Quantity) Volume 7: Appendix 19A
Issue/Concern:	The baseline characterization lacks detail regarding year-to-year hydrometric variability and groundwater-surface water interactions. In addition, the impact analysis does not clearly evaluate naturally occurring icings (aufeis) or spring ice damming risks at watercourse crossings. Where ice blockages or ponding occur, there may be implications for infiltration, permafrost and ground ice conditions, and regional drainage pathways that are not clearly assessed.
Information Request:	Please provide clarification and assessment addressing the following: <ol style="list-style-type: none"> 1. Characterize the year-to-year flow variability at the project hydrometric stations and provide an expanded discussion of groundwater-surface water interactions in the study area. 2. Describe known or potential locations of naturally occurring icings, including at potential water crossings, and provide available mapping where used. 3. Identify water crossings susceptible to spring ice damming, assess how proposed bridge/culvert structures may influence ice processes and backwatering, and outline mitigation and inspection plans. 4. Provide an assessment of how ponded surface water, ice blockage conditions, and altered infiltration rates could affect ground ice, permafrost stability, and regional drainage pathways, or identify where this assessment is provided elsewhere in the Impact Statement. 5. Assess whether altered drainage patterns could affect relevant drinking water locations and identify mitigation where needed.

IR Source:	CIRNAC
IR Number:	CIRNAC-IR 05
IR Directed to:	West Kitikmeot Resources Corp.
Subject:	Usage Scenarios, Regional Mine Transportation, and Dustfall Modeling
Reference:	Volume 1 MD 2.3 (Future Development) Volume 1 MD 10 (Additional Assessments and Conclusions) Volume 2 Introduction Volume 4 Effects Assessment Methodology Table 9A2.16 Volume 5 Section 11 (Effects on Air Quality) Volumes 6, 7, 9
Issue/Concern:	WKR's cargo logistics contain important inconsistencies between the road transportation assumptions and marine shipping assumptions: the port anticipates 30 bulk carriers/year (requiring 2.4 million tonnes of ore), but the transportation plans assume only 30 truck transits per year. This gap prevents any accurate evaluation of fugitive emissions from the 190,000 m ² concentrate storage pad and the road. Furthermore, dustfall modeling completely excludes emissions from these induced regional mine developments. Omitting these emissions creates a material gap in the



	assessment of cumulative effects for soil, vegetation, water quality, and human health.
Information Request:	<p>Please provide a usage scenario for the Road and the Port operations, including the RFI activities.</p> <p>Key elements of the scenario should include:</p> <ol style="list-style-type: none"> 1. A realistic road and port usage scenario that includes Reasonably Foreseeable Induced (RFI) activities (Izok, Hackett, High Lake mines) and resolves the contradiction between ship cargo capacity and road truck transit counts. 2. Exact shipping assumptions, truck numbers, and seasonal operating windows, establishing the upper credible operating limit. 3. Cumulative dustfall modeling to incorporate the RFI road transportation and port concentrate storage emissions. 4. Quantify and discuss the acid-generation and metal-leaching potential of the concentrate ore dust. 5. Dustfall impacts on surrounding soil, vegetation, sediments, surface water, and human health, identifying appropriate containment and mitigation measures based on updated modeling and leaching assays.

Environment and Climate Change Canada (ECCC)

IR Source:	ECCC
IR Number:	ECCC-IR 01
IR Directed to:	Proponent
Subject:	Laydown areas and contact water management
Reference:	<p>Grays Bay Road and Port Impact Statement (April 2026)</p> <p>Volume 1 Main Volume</p> <ul style="list-style-type: none"> - Section MD.2.3 Future Development <ul style="list-style-type: none"> - Table MD.2.1 Project Components - Section MD.2.6.2.3 Material and Equipment Management
Issue/Concern:	Laydown areas at Jericho Station and Grays Bay Port may be used to store commodities, including potential third-party concentrates, which could present a risk of contaminant mobilization via contact water (e.g., precipitation, snowmelt). It is unclear whether contact water management measures will be implemented to prevent release to the surrounding environment. ECCC recommends that the Proponent implement and describe a contact water management approach for laydown areas to prevent contaminant release to the environment.
Information Request:	<p>ECCC requests that the Proponent clarify:</p> <ol style="list-style-type: none"> 1. Whether laydown areas will include engineered controls (e.g., liners, berms, runoff collection); 2. Whether laydown areas will be used to store commodities that could release contaminants; and 3. Whether contact water will be collected, monitored, and treated, as required.
IR Source:	ECCC
IR Number:	ECCC-IR 02



IR Directed to:	Proponent
Subject:	Secondary containment management
Reference:	Grays Bay Road and Port Impact Statement (April 2026) Volume 1 Main Volume <ul style="list-style-type: none"> - Section MD.2.6.2.8 Fuel Management and Power Generation Volume 11. Management Plans <ul style="list-style-type: none"> - Attachment H5 Spill Contingency Plan <ul style="list-style-type: none"> - Section 4.1.1 Management Response
Issue/Concern:	<p>The management plans reference the use of secondary containment for the fuel farm, fuel and hazardous materials; however, it is unclear how the Proponent will ensure that adequate freeboard volume is maintained at all times to contain a worst-case release, particularly where precipitation and snowmelt may accumulate within containment systems.</p> <p>The Proponent should provide clear procedures to ensure secondary containment systems maintain adequate capacity at all times, including routine inspection, removal and management of accumulated precipitation, and confirmation that containment remains capable of fully capturing a release under worst-case conditions.</p>
Information Request:	<p>ECCC requests that the Proponent clarify:</p> <ol style="list-style-type: none"> 1. How the Proponent will ensure sufficient available capacity is maintained within secondary containment (e.g., inspection frequency, pumping/removal of accumulated water or snow); 2. Whether procedures are in place to monitor and manage precipitation accumulation to prevent loss of containment effectiveness; and 3. How collected water within containment will be assessed and managed (e.g., testing, treatment, disposal) prior to release.

IR Source:	ECCC
IR Number:	ECCC-IR 03
IR Directed to:	Proponent
Subject:	Marine Spill Response Preparedness
Reference:	Grays Bay Road and Port Impact Statement (April 2026) Volume 1 Main Volume <ul style="list-style-type: none"> - Appendix B Mitigations and Commitments <ul style="list-style-type: none"> - Mitigation Measure ID#257 Volume 10. Additional Assessments and Conclusions <ul style="list-style-type: none"> - Section 34.4.2 Marine Hazardous Materials Spill - Section 34.6.2 Emergency Preparedness and Response - Section 34.7.2 Marine Hazardous Materials Spill Volume 11. Management Plans <ul style="list-style-type: none"> - Appendix 37H Environmental Protection Plan (Draft) <ul style="list-style-type: none"> - Section 3.5 Fuel Handling and Storage <ul style="list-style-type: none"> - Table 3.6 Mitigation Measures for Fuel Handling and Storage - Section 3.9 Spill Prevention and Response <ul style="list-style-type: none"> - Table 3.10 Mitigation Measures for Spill Prevention and Response



Issue/Concern:	<p>Vessel traffic presents a risk for the uncontrolled release of hazardous substances into the marine environment, and robust spill preparedness is essential to mitigate this risk. It is unclear whether the Proponent has conducted or plans to conduct pre-spill planning (e.g., spill modelling, sensitivity mapping, pre-shoreline clean-up assessment technique [Pre-SCAT], or equivalent) to identify environmental sensitivities and response priorities specific to the Grays Bay marine environment in the event of a worst-case spill (e.g., a large fuel release).</p> <p>ECCC recommends that the Proponent undertake and document pre-spill planning for the marine environment to identify response priorities and ensure that appropriate, location-specific response strategies are in place for worst-case spill scenarios preparedness.</p>
Information Request:	<p>ECCC requests that the Proponent clarify:</p> <ol style="list-style-type: none"> 1. Whether pre-spill assessments have been or will be completed to characterize environmental sensitivities, spill fate and behaviour, and priorities for the protection of the environment (e.g., shoreline habitats, marine mammals, migratory birds); and 2. How the results of these assessments will inform spill response decision-making and operational prioritization during a major marine incident.

IR Source:	ECCC
IR Number:	ECCC-IR 04
IR Directed to:	Proponent
Subject:	In-situ burning as a response method to spills
Reference:	<p>Grays Bay Road and Port Impact Statement (April 2026) Volume 11 Management Plans</p> <ul style="list-style-type: none"> - Attachment H5 Spill Contingency Plan (Draft) - Section 2.4.9 Burning Spills
Issue/Concern:	<p>The Proponent identifies in-situ burning as a potential spill response strategy; however, it is unclear whether the use of this technique has been assessed for feasibility and regulatory compliance within the context of the Project. In-situ burning may result in the release of contaminants to air and water. ECCC would like to highlight that a smoke plume could potentially trigger prohibitions in the <i>Migratory Birds Convention Act</i> (MBCA) and <i>Migratory Birds Regulations</i> (MBR), particularly subsections 5.1(1) or 5.1(2) of the MBCA. Currently, there is not a pathway to the federal authorization of in-situ burning in a marine environment.</p> <p>ECCC recommends that the Proponent describe the decision framework and regulatory considerations associated with in-situ burning.</p>
Information Request:	ECCC requests that the Proponent clarify under what conditions and decision-making framework in-situ burning would be considered.

IR Source:	ECCC
IR Number:	ECCC-IR 05



IR Directed to:	Proponent
Subject:	Metal leaching / acid rock drainage (ML/ARD) potential
Reference:	<p>Grays Bay Road and Port Impact Statement (April 2026) Volume 7 Freshwater Environment</p> <ul style="list-style-type: none"> - Section 19.2.1.2 Surface Water and Sediment Quality – Geochemistry <p>Mine Environment Neutral Drainage (MEND) (2009). Prediction Manual for Drainage Chemistry for Sulphidic Geologic Materials. MEND Report 1.20.1. https://mend-nedem.org/wp-content/uploads/1.20.1_PredictionManual.pdf</p>
Issue/Concern:	<p>In Section 19.2.1.2, the Proponent indicates that the geochemistry information used to characterize geochemical conditions within the Local Assessment Area (LAA) and Regional Assessment Area (RAA) was compiled from existing datasets and a previous study, the 2013 Izok Corridor Project. The Izok study included a ML/ARD risk assessment related to the proposed roadway from Grays Bay to the Izok site.</p> <p>The Proponent has identified criteria for classifying a sample as potentially acid generating (PAG) or non-PAG, along with the associated ML/ARD risk levels. For classification as non-PAG, the criteria include the following conditions: “<i>Non-PAG: samples with carbonate NPR [neutralization potential ratio] <2 and total sulphur <0.05 wt.%</i>”</p> <p>ECCC notes that the NPR calculation is based on the neutralization potential as well as the amount of acid potential present in the geological material. If calculation using the acid-based accounting (ABA) method indicates that $NPR < 2$, it implies that the material has limited neutralization potential and should be classified as PAG or Uncertain, rather than Non-PAG, in accordance with Chapter 14 of MEND (2009). Clarification of the rationale for the PAG / Non-PAG classification is needed to support the review of potential impacts from ML/ARD.</p>
Information Request:	ECCC requests that the Proponent clarify why they classify material with low neutralization potential (i.e., carbonate $NPR < 2$) as non-PAG.

IR Source:	ECCC
IR Number:	ECCC-IR 06
IR Directed to:	Proponent
Subject:	Freshwater quality baseline data
Reference:	<p>Grays Bay Road and Port Impact Statement (April 2026) Volume 7 Freshwater Environment</p> <ul style="list-style-type: none"> - Section 19.2 Baseline conditions - Section 19.7 Follow-up and monitoring - Appendix 19C Freshwater and Sediment Quality Data Report - Section 2.1.2 Selected Monitoring Sites <p>Appendix E Compiled Laboratory Results for Surface Water and Sediment Quality (Screened Against Applicable Guidelines) with Summary Statistics</p>



Issue/Concern:	<p>In the discussion of the freshwater quality baseline, the Proponent refers to data from historical sampling (2012), along with supplemental data (2024) to characterize baseline spatial and temporal variability in surface water quality. However, there is uncertainty as to whether this baseline dataset is sufficiently robust to adequately characterize the baseline conditions. ECCC notes the following potential limitations and areas of uncertainty associated with the compiled baseline water quality dataset:</p> <ol style="list-style-type: none"> 1. <u>Limited number of samples</u>: The total baseline water quality dataset is based on 39 samples, including lakes, streams, and rivers, spread across an area of 230 km. 2. <u>Out-dated samples, >10 years old</u>: The majority of data is compiled from historical sampling, with 33 samples collected in 2012, and 6 collected in 2024. Current conditions are therefore largely unknown. 3. <u>Lack of temporal variability or seasonality</u>: All sampling was completed in August of the given sampling year and no monitoring locations were sampled more than once. Temporal and seasonal variability is unknown. 4. <u>Uneven spatial coverage of sampling across the Project Development Area (PDA)</u>: The Project spans five watersheds, and will require over 100 water crossings, but in some cases (e.g. James River) there is only one sample representing an entire watershed. In addition, the reliance on historic data has resulted in certain areas being overrepresented in the baseline dataset, potentially skewing results (e.g. 23/39 samples are from the High Lake Mine area in the High Lake Watershed). 5. <u>Natural exceedances</u>: Comparison of baseline monitoring data to aquatic life guidelines indicates the potential for natural exceedances of water quality guidelines; however, the lack of confirmatory sampling introduces uncertainty into these conclusions. <p>It is acknowledged that it is not feasible to sample all creeks and waterbodies that intersect with the Project, but understanding the existing baseline water quality is an important component in the future ability to be able to detect and respond to potential changes and impacts associated with Project Construction and Operations. The limitations and shortfalls of the established baseline water quality dataset are not discussed in the Impact Statement, but should be acknowledged, along with any proposed plans to reduce data gaps and uncertainty.</p> <p>In addition, Section 19.7 states that “<i>existing baseline data can be used to support future monitoring efforts</i>” but it is unclear how the Proponent would use the existing dataset in future analysis e.g., if it is the intention to use the baseline dataset to extrapolate to other waterbodies during future monitoring efforts to determine whether changes to water quality are occurring. The accurate characterization of baseline water quality data is particularly important if this data is proposed to serve as a proxy indicator for the assessment of Project-related effects for other unsampled waterbodies.</p>
-----------------------	--



Information Request:	<p>ECCC requests that the Proponent provide the following information:</p> <ol style="list-style-type: none"> 1. Discussion on the limitations and uncertainties associated with the proposed baseline water quality dataset addressing topics 1 to 5 from the comment above. This may include a description of any plans to reduce data gaps and uncertainty; and 2. A description of how the baseline water quality dataset is proposed to be used to support monitoring during Construction and Operational phases, including whether the dataset will be extrapolated and assumed to represent baseline conditions in other waterbodies.
-----------------------------	--

IR Source:	ECCC
IR Number:	ECCC-IR 07
IR Directed to:	Proponent
Subject:	Lake Water Quality Baseline Data
Reference:	<p>Grays Bay Road and Port Impact Statement (April 2026) Volume 7 Freshwater Environment</p> <ul style="list-style-type: none"> - Section 19.2 Baseline Conditions - Appendix 19C Freshwater and Sediment Quality Data Report <ul style="list-style-type: none"> - Section 2.1.2 Selected Monitoring Sites - Appendix E Compiled Laboratory Results for Surface Water and Sediment Quality (Screened Against Applicable Guidelines) with Summary Statistics
Issue/Concern:	<p>There are 29 samples included in the “lakes” baseline water quality dataset, the majority (>50%) of which are sourced from the 2012 High Lake Mine Dataset. No rationale is provided for how it was determined that this dataset was suitable to characterize baseline water quality for the larger Project Development Area. Areas where mining development occurs, such as the High Lake Mine, are usually highly mineralized and it would be expected that water quality in this area may exhibit elevated concentrations of metals relative to other non-mineralized areas in the region. Including the High Lake data in a broader regional dataset without accounting for the specific differences of this area may skew summary statistics, and lead to overestimation of regional metal concentrations and misinterpretation of overall baseline water quality. The data provided in Appendix E indicate that several parameters that exceed guidelines in High Lake (e.g. cadmium, cobalt, dissolved zinc), but not in other monitored lakes. The Impact Statement provides no discussion on the regional differences of the dataset.</p> <p>In addition, all lake data was pooled into one dataset, regardless of lake size and sampling depth, with no rationale provided for this approach. As noted in the report, the lake depths ranged from 1 m to >30 m, and water quality samples were collected at depths ranging from 0.5 m to 30 m. Water quality often differs among lakes of varying depths because depth strongly influences thermal stratification, oxygen dynamics, and biogeochemical processes. The Impact Statement provides no discussion on the differences in lake depths and compilation of this data.</p>



	It is important to understand the methodology and rationale for how baseline was established to ensure that the existing environment is adequately characterized and to provide confidence in the Proponent's ability to predict and measure change.
Information Request:	ECCC requests that the Proponent provide the following additional information: <ol style="list-style-type: none"> 1. An assessment of how the High Lake data differ from other lake water quality data; 2. Rationale for inclusion of the High Lake Baseline water quality in the regional baseline water quality dataset; and 3. Rationale for pooling all lake water quality into one dataset, regardless of lake size and depth.

IR Source:	ECCC
IR Number:	ECCC-IR 08
IR Directed to:	Proponent
Subject:	Water Quality Guidelines - Ammonia
Reference:	Grays Bay Road and Port Impact Statement (April 2026) Volume 7 Freshwater Environment <ul style="list-style-type: none"> - Appendix 19C Freshwater and Sediment Quality Data Report - Appendix E Compiled Laboratory Results for Surface Water and Sediment Quality (Screened Against Applicable Guidelines) with Summary Statistics
Issue/Concern:	The tables provided in Appendix 19C include summaries of monitoring results compared to relevant water quality guidelines. However, no guideline is provided for ammonia, which is a potential contaminant of concern during Construction and Operations due to the use of Ammonium Nitrate/Fuel Oil (ANFO) blasting agents. It is important to identify water quality guidelines that will be used to inform the assessment of potential impacts on water quality that can cause effects to fish and fish habitat.
Information Request:	ECCC requests that the Proponent provide information on the proposed freshwater water quality guideline for ammonia that will be applied to the Project to avoid or minimize effects to fish and fish habitat.

IR Source:	ECCC
IR Number:	ECCC-IR 09
IR Directed to:	Proponent
Subject:	Desalination plant
Reference:	Grays Bay Road and Port Impact Statement (April 2026) Volume 8 Marine Environment <ul style="list-style-type: none"> - Section 21.3.2: Change in Marine Water Quality
Issue/Concern:	During the Construction phase, " <i>The Project will require fresh water from a desalination plant that will be discharging brine to the marine environment through an outfall on the seabed near the barge landing area of the Port PDA.</i> " Fresh water requirements are based on an estimate of 100 people stationed at Grays Bay Port camp. During the Operations and Maintenance phase, the primary source of potable water " <i>is planned to be withdrawn from suitable lakes and the desalination plant would be used as a secondary source as required.</i> "



	Given that suitable lakes are proposed as the primary source of potable water during Operations, it is surprising that a desalination plant is proposed as a secondary source, considering the need to discharge desalination brine. Further information on the challenges of using local lakes would be helpful to explain the choice of potable water source.
Information Request:	ECCC requests that the Proponent provide the following information: <ol style="list-style-type: none"> 1. Identify suitable lakes being considered as potable water sources for the Operations and Maintenance phase; and 2. Discuss why desalination of seawater for use as potable water is preferred over utilizing freshwater during the Construction phase.

IR Source:	ECCC
IR Number:	ECCC-IR 10
IR Directed to:	Proponent
Subject:	Marine outfall modelling
Reference:	Grays Bay Road and Port Impact Statement (April 2026) Volume 1 Main Document <ul style="list-style-type: none"> - Table MD.2.1 Project Components Volume 8 Marine Environment <ul style="list-style-type: none"> - Section 21.3.2.2 Project Effects Pathways - Section 22.3.2.4 Project Residual Effect
Issue/Concern:	<p>In Section 21.3.2.2, the Proponent indicates that desalination brine and treated wastewater may be discharged to the marine environment through a marine outfall. The outfall is expected to be located near the barge landing area and would “<i>extend approximately 100 m offshore to a minimum water depth of 10 m.</i>”</p> <p>Mixing of effluent from the outfall was modelled using the CORMIX software. Inputs included: the lower (ebb tide) marine bottom current velocities measurements made in August 2025, estimated combined effluent flows, estimated salinity of discharged brine, estimated total suspended solids concentration in effluent, and measured ambient salinity in the receiving environment in July 2025. The modelled mixing zone sizes are 6 m and 28 m for the Construction and Operations phases respectively. Effluent discharge is planned year-round but there is no discussion of seasonal influences on bottom currents. For example, the 2 m thick landfast ice could conceivably alter the values measured in August.</p> <p>Effluents were modelled for the Construction and Operations phases based on different estimates for the number of people using the facilities. For the Construction phase, the effluent combined brine from desalination of potable water for 100 people and treated wastewater from 200 people. For the Operations phase, the effluent volume estimate assumed 150 people for brine discharge and 350 people for wastewater discharge.</p> <p>Estimates of the number of people generating effluent do not match the Project description. The permanent facilities would include accommodations for 80 and 40 people at the Port Site and Jericho Station respectively, with operational workforces of 42 and 12 people respectively. The Proponent acknowledges that the estimates are conservative, noting: “...average</p>



	<p><i>effluent discharge will be significantly less during operations than construction even though the modelling conservatively assumes a greater effluent discharge during operations.</i> While it is typical to create conservative estimates, they should be plausible given the Project description.</p> <p>Additional information on the CORMIX modelling is needed to evaluate the predictions of the models and the potential impacts from the marine effluent discharge.</p>
Information Request:	<p>ECCC requests that the Proponent provide the following information:</p> <ol style="list-style-type: none"> 1. Additional detail on the CORMIX modelling, including a figure of the geometry used and the model results for the concentrations at different distances from the diffuser; 2. Discuss effects of ice cover on the mixing zone during winter; and 3. Explain how the number of people generating brine and wastewater effluent during the Operations phase was determined.

IR Source:	ECCC
IR Number:	ECCC-IR 11
IR Directed to:	Proponent
Subject:	Practicality of mitigation measures
Reference:	<p>Grays Bay Road and Port Impact Statement (April 2026) Volume 8 – Marine Environment</p> <ul style="list-style-type: none"> - Section 21.3.2.3: Mitigation, Management, and Enhancement Measures
Issue/Concern:	<p>In Section 21.3.2.3, several mitigation measures are qualified with “<i>where practical</i>” or “<i>where practicable</i>”. For example, “<i>where practical, only material with low acid rock drainage and metal leaching potential will be used...</i>” and “<i>Silt curtains (or equivalent device) shall be used during nearshore dredging activities at the marine terminal (i.e., vessel berths), where practicable</i>”. It is not clear what alternatives will be used when the proposed measures are not practical. Clarification on any potential alternative measures is needed to allow for assessment of the proposed mitigation measures.</p>
Information Request:	<p>ECCC requests that the Proponent provide the following information:</p> <ol style="list-style-type: none"> 1. Examples of conditions when it might not be practical to use “<i>only material with low acid rock drainage and metal leaching potential (ARD/ML)</i>” during Construction, and alternative mitigation measures proposed; and 2. Examples of conditions when it might not be practicable to use silt curtains (or equivalent devices) “<i>during nearshore dredging activities at the marine terminal</i>” and alternative mitigation measures proposed.

IR Source:	ECCC
IR Number:	ECCC-IR 12
IR Directed to:	Proponent
Subject:	Marine water and sediment quality analyses detection limits
Reference:	<p>Grays Bay Road and Port Impact Statement (April 2026)</p> <ul style="list-style-type: none"> - Appendix 21A Marine Water and Sediment Quality Baseline Report - Section 5.2.2.2 Analytical Results



	<p>- Section 5.4.2.2 Analytical Results</p> <p>Canadian Council of Ministers of the Environment (CCME) Canadian Environmental Quality Guidelines. https://ccme.ca/en/resources/water-aquatic-life</p>
Issue/Concern:	<p>In order to measure the potential effect of Project activities on marine water quality and sediment, it is necessary to measure parameter concentrations with sufficient accuracy to be able to detect changes that could impact the aquatic environment. The CCME guidelines for the protection of marine aquatic life provide well-accepted benchmarks.</p> <p>In several instances, the chemical analyses of baseline water and sediment samples have detection limits over the CCME guidelines. The Proponent assumes that parameters with detection limits over the guidelines have concentrations exceeding the guidelines. This may not be accurate and will not allow future monitoring to detect changes that might have an impact.</p> <p>Examples of detection limits above the CCME guidelines are six PAHs (acenaphthene, acenaphthylene, anthracene, dibenzo(a,h) anthracene, fluorene, 2-methylnaphthalene) in August 2024 sediment samples. For water quality, cadmium and chromium detection limits were above guidelines for the August 2024, July 2025 and August 2025, but not the May 2025 sampling campaigns. Since adequately low detection limits were attainable in May 2025, it is not clear why they were not used for other campaigns.</p>
Information Request:	<p>ECCC requests that the Proponent provide the following information:</p> <ol style="list-style-type: none"> 1. Explain why detection limits below CCME guidelines in marine water and sediment are not routinely used for all parameters in planned sample analyses; and 2. Discuss the uncertainty introduced into the baseline dataset by elevated detection limits, and how this uncertainty will be reduced.

IR Source:	ECCC
IR Number:	ECCC-IR 13
IR Directed to:	Proponent
Subject:	Baseline marine water quality data
Reference:	<p>Grays Bay Road and Port Impact Statement (April 2026)</p> <ul style="list-style-type: none"> - Appendix 21A Marine Water and Sediment Quality Baseline Report <ul style="list-style-type: none"> - Section 5.2.1 Historical Water Quality - Appendix A.3 CTD Profiles - Appendix A.4 Water Quality Results
Issue/Concern:	<p>Defining baseline conditions for marine water quality provides an understanding of how much the aquatic environment could change before any adverse impacts occur. It also provides a reference against which future monitoring can be compared to identify Project effects.</p> <p>In Section 5.2.1 of the Marine Water and Sediment Quality Baseline Report, the Proponent provides a map of historical marine sediment/water quality sampling locations along with a table of ranges of measured metal concentrations. Insufficient information is presented to adequately compare the historical data with data collected in 2024 and 2025.</p>



	<p>Certain tables of CTD (conductivity, temperature, depth) profiles (A.3-3, A.3-4, A.3-10 to A.3-18) are titled "<i>Modified Phase III ESA at Sointula Small Craft Harbour, Sointula, Malcom Island, BC</i>". It is not clear how this data is relevant to the Grays Bay Project.</p> <p>The water quality data for August 2024 and July 2025 includes shallow and deep samples for most stations. In August 2025 all samples are shallow and in May 2025, all samples are deep. Samples from both depths are pooled together when calculating statistics, but no rationale was provided on how this was deemed appropriate.</p>
Information Request:	<p>ECCC requests that the Proponent provide the following information:</p> <ol style="list-style-type: none"> 1. Details on historical baseline marine water quality including: which historical stations were sampled for water quality, periods of the year samples were collected, number of samples collected at each station, in each study, the depth at which samples were collected, detection limits for parameter analyses, data from all other parameters measured including salinity, temperature and total suspended solids, and discussion of if/how parameters varied among sampling locations; 2. Explain how and why CTD profile data from Malcolm Island BC should be considered for the Grays Bay Project; and 3. Discuss the method used to determine sample results from different depths were similar enough to be pooled together when calculating statistics.

IR Source:	ECCC
IR Number:	ECCC-IR 14
IR Directed to:	Proponent
Subject:	Turbidity units
Reference:	<p>Grays Bay Road and Port Impact Statement (April 2026)</p> <ul style="list-style-type: none"> - Appendix 21A Marine Water and Sediment Quality Baseline Report <ul style="list-style-type: none"> - Table 5.4 Minimum and Maximum Values from the Field Program Water Quality Profiles, 2024-2025 - Table 5.5 Values from the Geotech Drilling Program Water Quality Profiles, April/May 2025
Issue/Concern:	<p>Water quality profile turbidity data from the field program are reported in Nephelometric Turbidity Units (NTU) and those from the drilling program are reported in Formazin Turbidity Units (FTU). There is no discussion of how the units are comparable and how FTU measurements will be compared to CCME guidelines, which are in NTU. Agreement on the conversion factor to be used will ensure field measurements can accurately be compared to guidelines to monitor for potential effects.</p>
Information Request:	ECCC requests that the Proponent provide information on the conversion factor that will be used to convert turbidity measurements in FTU to NTU.

IR Source:	ECCC
IR Number:	ECCC-IR 15
IR Directed to:	Proponent
Subject:	Guidelines for nitrate concentrations in marine water



Reference:	<p>Grays Bay Road and Port Impact Statement (April 2026) Volume 8 Marine Environment</p> <ul style="list-style-type: none"> - Section 21 Assessment of Potential Effects on Marine Water and Sediment <ul style="list-style-type: none"> - Table 21.6: Marine Water Quality Results from the Sampling Locations in Grays Bay, 2024 - 2025 - Table 21.9: Description of Indicators and Thresholds for Marine Water Quality Effects Assessment - Appendix 21A Marine Water and Sediment Quality Baseline Report <ul style="list-style-type: none"> - Table 5.6: Water Quality Results from the Sampling Locations in Grays Bay, 2024 - 2025 <p>Canadian Council of Ministers of the Environment (CCME) Canadian Environmental Quality Guidelines. https://ccme.ca/en/resources/water-aquatic-life</p>
Issue/Concern:	<p>Tables 5.6 and 21.6 compare measured marine water quality results against CCME water quality guidelines for the protection of aquatic life (WQG-PAL). The WQG used for nitrate (550 mg/L short term, 13 mg/L long term) was developed for freshwater rather than marine water. Table 21.9 lists the CCME guideline for nitrate for marine water, but it is not used in comparisons. The inconsistency makes it unclear as to which guideline will be used for the Project; clarification is needed to complete a technical review of the potential impacts to marine water quality and effects on fish and fish habitat.</p>
Information Request:	<p>ECCC requests that the Proponent clarify which guideline they propose to use for the protection of marine life for nitrate concentrations.</p>

IR Source:	ECCC
IR Number:	ECCC-IR 16
IR Directed to:	Proponent
Subject:	Residual effect sensitivity
Reference:	<p>Grays Bay Road and Port Impact Statement (April 2026) Volume 8 Marine Environment</p> <ul style="list-style-type: none"> - Section 21 Assessment of Potential Effects on Marine Water and Sediment <ul style="list-style-type: none"> - Section 21.3.2.4 Project Residual Effect - Section 21.3.3.4 Project Residual Effect <ul style="list-style-type: none"> - Table 21.14. Project Interactions with Marine Water and Sediment
Issue/Concern:	<p>Table 21.14 indicates three levels of sensitivity to residual effects based on the timing of Project interactions: no sensitivity, moderate sensitivity, and high sensitivity. The Impact Statement concludes that marine water and sediment quality will not be sensitive to residual effects due to infrastructure construction, dredging, and vessel activity because these activities will occur during the open water season.</p> <p>Although there will be more mixing in marine waters during the open water season, it is unclear how the Proponent concluded there would be no residual effects during this period from the activities listed. Properly</p>



	identifying possible residual effects will inform monitoring to ensure that any changes are acceptable.
Information Request:	ECCC requests that the Proponent explain how they concluded there is “no sensitivity” to residual effects from infrastructure construction, dredging and vessel activity.
IR Source:	ECCC
IR Number:	ECCC-IR 17
IR Directed to:	Proponent
Subject:	Jericho Station – Project description, baseline soil and water quality data, effects assessment, closure and reclamation
Reference:	<p>Grays Bay Road and Port Impact Statement (April 2026)</p> <p>Volume 2 Introduction, Project Description and Alternatives</p> <ul style="list-style-type: none"> - Section 2.6. Detailed Scope of the Project <p>Volume 6 Terrestrial Environment</p> <ul style="list-style-type: none"> - Section 14.2 Baseline Conditions - Section 14.1.3 Potential Effects, Pathways, and Measurable Parameters - Section 14.3 Assessment of Project Effects on Terrain, Soils, and Permafrost <p>Volume 7 Freshwater Environment</p> <ul style="list-style-type: none"> - Section 19.2.1.2. Surface Water and Sediment Quality
Issue/Concern:	The effects assessment provides no evaluation of potential contaminant mobilization from soils at the Jericho site. Construction may disturb contaminated soil and redistribute contaminants into previously unaffected areas. Additional information and analyses are needed to assess for potential Project effects related to mobilization of contaminants, including spatial comparison between project infrastructure and contaminated areas, and characterization of contaminated soils, surface water and sediments to establish baseline conditions. Historical contamination of soil and water should be considered in closure planning, as the site may remain a source of contaminants beyond the Construction and Operations phases of the Project.
Information Request:	<p>ECCC requests that the Proponent provide:</p> <ol style="list-style-type: none"> 1. Spatial mapping showing proposed development in relation to contaminated areas; 2. A delineation of all contaminated soils and associated soil chemistry; 3. Baseline surface water and sediment quality data for all surface water features at the Jericho site, including all parameters related to historical contamination sources and mining activities 4. A conceptual site model complete with: <ol style="list-style-type: none"> a) known and suspected areas of contamination in soil, surface water and groundwater; b) potential exposure pathways in soil, surface water, groundwater, and air; and c) known ecological receptors at the site or receptors that are reasonably suspected to be present within relevant timeframes.



	<p>5. Assessment of the potential for contaminant mobilization due to disturbance of contaminated soil at the Jericho site during Construction and Operations phases of the Project, and potential effects to surface water quality, fish, fish habitat and migratory birds.</p> <p>6. Information on how historical contamination in soil and surface water at the Jericho site will be risk managed or remediated as part of Project closure planning</p> <p>The Jericho Mine Site is located on federal and Inuit-owned land. ECCC refers the Proponent to CIRNAC for information related to historical contamination for the areas of the site on federal land; for information on the Inuit-owned lands, the Proponent is referred to the Kitikmeot Inuit Association.</p>
IR Source:	ECCC
IR Number:	ECCC-IR 18
IR Directed to:	Proponent
Subject:	Climate change resilience
Reference:	<p>Grays Bay Road and Port Impact Statement (April 2026) Volume 5 Atmospheric Environment</p> <ul style="list-style-type: none"> - Section 12 Climate - Appendix 12A Climate Profile Technical Data Report - Appendix 12B Climate Change Risk Assessment Technical Data Report
Issue/Concern:	The Proponent provides a full climate change risk assessment (CCRA) in Appendix 12B (summarized in Section 12.5) based on an assessment of the likelihood of climate hazards and their potential consequences. Potential adaptation measures are provided for the high risks that were identified in the CCRA. However, it is not clear which of these adaptation measures the proponent plans to implement. It is important to clarify the approach to implementing adaptation measures to allow for a review of proposed methods to address high risk climate hazards.
Information Request:	ECCC requests that the Proponent clarify the approach that will be taken to identify and implement appropriate adaptation measures discussed in the CCRA.

IR Source:	ECCC
IR Number:	ECCC-IR 19
IR Directed to:	Proponent
Subject:	Net-Zero Planning
Reference:	<p>Grays Bay Road and Port Impact Statement (April 2026) Volume 5 Atmospheric Environment</p> <ul style="list-style-type: none"> - Section 12.4.3 GHG Emissions Quantification <p>Guidelines for the Preparation of an Impact Statement for West Kitikmeot Resources Corp's Grays Bay Road and Port Proposal (Nunavut Impact Review Board (NIRB), January 30, 2026)</p> <ul style="list-style-type: none"> - 7.4.2.1 Climate Change <ul style="list-style-type: none"> - a) Identifying Project Contributions to Climate Change



	Draft Technical Guide Related to the Strategic Assessment of Climate Change (SACC) (Environment and Climate Change Canada, August 2021) https://www.canada.ca/en/environment-climate-change/corporate/transparency/consultations/draft-technical-guide-strategic-assessment-climate-change.html#toc40
Issue/Concern:	Section 7.4.2.1 of NIRB's Impact Statement Guidelines indicates that the Impact Statement must include "a discussion on the project's GHG emissions and impacts to Nunavut and Canada's climate change efforts", and that the discussion shall include "For projects with lifetimes to 2050 and beyond, a net-zero plan that would build off the best available technologies and environmental practices evaluation in order to achieve net-zero emissions by 2050". The Project is expected to continue past 2050 with a design life of 75 years, however there is no net-zero plan provided.
Information Request:	ECCC requests that the Proponent provide a net-zero plan in order to align with the Impact Statement Guidelines. Section 3.5 of the Strategic Assessment of Climate Change (SACC) Technical Guide may provide guidance for the net-zero plan. The net-zero plan should be based on the Best Available Technologies / Best Environmental Practices (BAT/BEP) determination process that considers technical feasibility, GHG reduction potential, and economic feasibility.

IR Source:	ECCC
IR Number:	ECCC-IR 20
IR Directed to:	Proponent
Subject:	Estimation of Impact on Carbon Sinks
Reference:	Grays Bay Road and Port Impact Statement (April 2026) Volume 5 Atmospheric Environment - Section 12.4.3 GHG Emissions Quantification Guidelines for the Preparation of an Impact Statement for West Kitikmeot Resources Corp's Grays Bay Road and Port Proposal (Nunavut Impact Review Board (NIRB), January 30, 2026) - 7.4.2.1 Climate Change a) Identifying Project Contributions to Climate Change Draft Technical Guide Related to the Strategic Assessment of Climate Change (SACC) (Environment and Climate Change Canada, August 2021) https://www.canada.ca/en/environment-climate-change/corporate/transparency/consultations/draft-technical-guide-strategic-assessment-climate-change.html#toc40
Issue/Concern:	Section 7.4.2.1 of NIRB's Impact Statement Guidelines indicates that the discussion on the Project's greenhouse gas (GHG) emissions and impacts to climate change efforts shall include "a quantitative and qualitative description of the positive and negative impacts on carbon sinks and sources..." The Proponent estimated GHG emissions related to land-use change, however there is no estimation of the Project's potential impact on carbon sinks.



Information Request:	ECCC recommends that the Proponent provide an estimate of the Project's impact on carbon sinks and sources in order to align with the Impact Statement Guidelines. Section 3.5.3 and Section 4 of the SACC Technical Guide may provide guidance for the estimation.
-----------------------------	---

IR Source:	ECCC
IR Number:	ECCC-IR 21
IR Directed to:	Proponent
Subject:	Selection of Canadian Ambient Air Quality Standards (CAAQS) for Particulate Matter (PM _{2.5})
Reference:	<p>Grays Bay Road and Port Impact Statement (April 2026) Volume 5 Atmospheric Environment</p> <ul style="list-style-type: none"> - Section 11.1.2 Regulatory and Policy Setting - Table 11.2 Ambient Air Quality Standards, Objectives and Guidelines <p>Canadian Council of Ministers of the Environment (CCME) Canadian Ambient Air Quality Standards (CAAQS) for PM_{2.5}, O₃, SO₂ and NO₂, available at https://ccme.ca/en/air-quality-report#slide-7</p>
Issue/Concern:	Table 11.2 lists the air quality standards that were used in the impact assessment, including the CCME's 24-hour and annual CAAQS for PM _{2.5} (27 and 8.8 µg/m ³ , respectively). The CCME has updated the PM _{2.5} standards for 2030, lowering the values for 24-hour and annual standards to 23 and 8.0 µg/m ³ , respectively. Given the Construction and Operations timeline for this Project, the 2030 values would be more appropriate for assessing potential future impacts on air quality.
Information Request:	ECCC requests that the Proponent clarify whether the updated 2030 CAAQS for PM _{2.5} will be used in the analysis of Project-related impacts to air quality.

IR Source:	ECCC
IR Number:	ECCC-IR 22
IR Directed to:	Proponent
Subject:	Incinerator mitigation for dioxins and furans
Reference:	<p>Grays Bay Road and Port Impact Statement (April 2026) Volume 5 Atmospheric Environment</p> <ul style="list-style-type: none"> - Section 11.3.2.2 Project Effects Pathways <p>Mukherjee et al. 2016. A review on technologies of removal of dioxins and furans from incinerator flue gas. Procedia Environmental Sciences 35. https://doi.org/10.1016/j.proenv.2016.07.037</p>



Issue/Concern:	In Section 11.3.2.2, the Proponent states that incinerator stack gases will be released to the atmosphere at a temperature higher than 700°C to reduce the chances of the inadvertent formation of dioxins and furans through the de novo synthesis process. Based on this approach, along with other operational considerations, the Proponent expects waste emissions from the incinerators to be less than the Canada-wide Standards for dioxins and furans. However, it is unclear if the flue gas will be cooled rapidly enough to prevent formation of dioxins and furans (e.g., Mukherjee et al. 2016). In order to inform the assessment of impacts from incinerator gases, the Proponent should clarify whether stack testing will be planned for the incinerators.
Information Request:	ECCC requests that the Proponent clarify whether stack testing of the incinerators will be planned, to confirm whether engineering controls are successful in preventing formation of dioxins and furans.

IR Source:	ECCC
IR Number:	ECCC-IR 23
IR Directed to:	Proponent
Subject:	Truck and vessel traffic
Reference:	Grays Bay Road and Port Impact Statement (April 2026) Volume 10 Additional Assessments and Conclusions <ul style="list-style-type: none"> - Section 32. Cumulative Effects Assessment Overview - Section 32.3 Regional and Future Perspectives
Issue/Concern:	Estimates of traffic on the road and at the port are provided for the reasonably foreseeable scenario. An annual average of 31 concentrate trucks are estimated to transit the road per year, and 30 concentrate ships (bulk carriers) are estimated to use the port per year. The port will be designed to accommodate Post-Panamax sized carriers (~100 000 Deadweight Tonnage (DWT)); larger concentrate trucks typically have capacities that are less than one percent of the ore carrier vessels. This would suggest that the 31 concentrate trucks estimated for the annual average could each be conducting many trips each year. Given that the cumulative effects assessment relies on accurate estimates of road traffic, it is important to clarify the actual number of truck transits expected per year.
Information Request:	ECCC requests that the Proponent: <ol style="list-style-type: none"> 1. Provide an estimate of the number of truck transits per year on the road for the reasonably foreseeable scenario; and 2. Clarify if this estimated number of truck transits was used in the cumulative effects assessment.

IR Source:	ECCC
IR Number:	ECCC-IR 24
IR Directed to:	Proponent
Subject:	Potential impacts to Peary Caribou
Reference:	Grays Bay Road and Port Impact Statement (April 2026) Volume 1 Main Document <ul style="list-style-type: none"> - Non-Technical Summary - Summary of Effects Assessment - Terrestrial Environment (Volume 6)



	<p>Guidelines for the Preparation of an Impact Statement for West Kitikmeot Resources Corp's Grays Bay Road and Port Proposal (January 2026, Nunavut Impact Review Board (NIRB))</p> <ul style="list-style-type: none"> - Section 7.2.2.1 Spatial Boundaries - Section 8.1.11 Terrestrial Wildlife and Wildlife Habitat <ul style="list-style-type: none"> - Section 8.1.11.1 Baseline Information <p>Peary Caribou (<i>Rangifer tarandus pearyi</i>): Recovery Strategy 2022. Peary Caribou (Rangifer tarandus pearyi): recovery strategy 2022 - Canada.ca</p>
Issue/Concern:	<p>Peary Caribou were not included in the Impact Statement. In Volume 1, Non-Technical Summary (Summary of Effects Assessment), the Proponent states: <i>"The Kitikmiut recognize only three types of tuktuit: mainland caribou, island caribou, and Peary caribou; the Project interacts with mainland caribou and island caribou. To align with Kitikmiut perspectives, separate assessments are completed for mainland caribou, which are best represented by the Bathurst Caribou Herd (BCH), and island caribou represented by the Dolphin and Union Herd (DUH)"</i>.</p> <p>As per Section 7.2.2.1 of the NIRB's Impact Statement Guidelines, <i>"The site study area (SSA) is the proposed project footprint (i.e., where proposed project activities would be undertaken including the project's proposed facilities, buildings and infrastructure, transportation corridors, access roads, shipping routes, etc..."</i></p> <p>In Section 8.1.11.1 of the Guidelines, the requirements for baseline information for Terrestrial Wildlife and Wildlife Habitat include: <i>"Description of wildlife populations, distributions, and ecologies in the Local Study Area and Regional Study Area, with emphasis on identified wildlife VECs and species with special designations (Species at Risk listed on Schedule 1 of the federal SARA and species with designations by the COSEWIC [Committee on the Status of Endangered Wildlife in Canada])"</i>.</p> <p>Although their Critical Habitat occurs outside the Marine Regional Assessment Area (RAA), project-related activities (e.g., shipping) extend beyond the Marine RAA and will occur within the Peary Caribou core range; it is noted that areas of sea ice are critical habitat.</p> <p>The Marine RAA may not sufficiently capture effects if year-round port activities are anticipated as it excludes consideration of the potential effects of shipping on Peary Caribou and their use of sea ice in particular. Peary Caribou require unimpeded ice-crossing to support migration and to access habitat that supports their life processes. Year-round shipping and ice-breaking activities will impact the ability of Peary Caribou to cross to the islands within the project area (e.g., Victoria Island and others).</p>



Information Request:	<p>ECCC requests that the Proponent provide:</p> <ul style="list-style-type: none"> -an assessment of adverse effects of the shipping component of the Project on Peary Caribou and their use of sea-ice related to critical habitat that occurs outside the Core range (identified in the Recovery Strategy), -any measures that will be taken to avoid or lessen those effects; and - approaches that will be taken to monitor the effectiveness of mitigation measures. <p>Alternatively, please provide a comprehensive rationale as to why Peary Caribou is not included in the Impact Statement.</p>
-----------------------------	---

IR Source:	ECCC
IR Number:	ECCC-IR 25
IR Directed to:	Proponent
Subject:	Location of quarries
Reference:	<p>Grays Bay Road and Port Impact Statement (April 2026) Volume 1 Main Document</p> <ul style="list-style-type: none"> - Section MD.2.6.2.5 Grays Bay Road - Section MD.2.6.2.6 Borrow Pits and Quarry Sites
Issue/Concern:	<p>In Section MD.2.6.2.5, the Proponent describes the activities associated with Grays Bay Road, noting that: <i>“Ongoing maintenance will rely on a network of permanent quarries along the alignment, supplying 50,000-100,000 cubic metres (m³) of granular material annually for resurfacing and repairs.”</i></p> <p>An additional permanent quarry at the port is described in Section MD2.6.2.6: <i>“A permanent quarry at the port will be maintained through Operations and Maintenance phase to support the 50,000m³ to 100,000m³ of granular material required annually for maintenance”</i></p> <p>It is unclear where the permanent quarries will be located and whether they will be located near areas of high importance to migratory birds (including species at risk migratory birds), terrestrial species at risk, and wetlands.</p>
Information Request:	ECCC requests that the Proponent confirm the locations of the permanent quarries providing the granular materials required annually for Operations and Maintenance, and whether these areas overlap with areas of high importance to migratory birds (including species at risk migratory birds), terrestrial species at risk, and wetlands.

IR Source:	ECCC
IR Number:	ECCC-IR 26
IR Directed to:	Proponent and Nunavut Impact Review Board (NIRB)
Subject:	Potential future alternative energy system
Reference:	<p>Grays Bay Road and Port Impact Statement (April 2026) Volume 1 Main Document</p> <ul style="list-style-type: none"> - Section MD.2.6.2.8 Fuel Management and Power Generation
Issue/Concern:	In Section MD.2.6.2.8, the Proponent refers to a potential future alternative energy system: <i>“The port may also include a 1 megawatt (MW) alternative energy system (wind, solar, battery) to reduce diesel reliance. Power generation will be provided by modular diesel plants: four units (6 MW total)</i>



	<p><i>at the port and two units (3 MW total) at Jericho Station, with capacity designed to meet routine and peak demands efficiently. These components will be established during Construction and continue through Operations and Maintenance”</i></p> <p>Potential future alternative energy systems may represent additional pathways of effect to all migratory birds (including species at risk migratory birds), any terrestrial species at risk found on any federal land in the Project’s Regional Assessment Area, and wetlands. It is unclear whether the potential future alternative energy systems will require assessment by the NIRB.</p>
Information Request:	ECCC requests that the Proponent confirm if the potential alternative energy systems will require assessment by NIRB. If potential alternative energy systems will not require a separate assessment, please confirm if the effects of this project component on migratory birds (including species at risk migratory birds), any terrestrial species at risk found on any federal land in the project’s Regional Assessment Area, and wetlands will be scoped into this assessment and considered in the cumulative effects assessment, and provide supporting rationale if they are not.

IR Source:	ECCC
IR Number:	ECCC-IR 27
IR Directed to:	Proponent
Subject:	Migratory bird nesting on Project equipment, infrastructure, and stockpiled granular materials
Reference:	<p>Grays Bay Road and Port Impact Statement (April 2026) Volume 2 Introduction, Project Description and Alternatives</p> <ul style="list-style-type: none"> - Section 2.6.2.4 Project Activities during Construction <ul style="list-style-type: none"> - Material and Equipment Staging - Camps
Issue/Concern:	<p>In Section 2.6.2.4, the Proponent describes the use of staging areas and mobile camps during Construction: <i>“Additional, smaller staging areas will be required to store and maintain equipment and supplies, stockpile granular material...”</i>; and <i>“The mobile camps are expected to be relocated approximately every three months, and their locations will be combined with other components (e.g., quarries) to reduce the total footprint of the Project.”</i></p> <p>It is unclear what measures will be taken if migratory bird nests are found on Project infrastructure. Migratory birds may build nests on Project equipment and infrastructure such as machinery, camps, and stockpiled granular materials.</p>
Information Request:	ECCC requests that the Proponent consider the effects of the staging areas and mobile camps and provide information on the measures to be taken if a migratory bird nest is found on project infrastructure, including inspections prior to using equipment, moving camps, and using stockpiled granular materials.

IR Source:	ECCC
IR Number:	ECCC-IR 28
IR Directed to:	Proponent



Subject:	Cumulative Effects
Reference:	Grays Bay Road and Port Impact Statement (April 2026) Volume 4 Effects Assessment Methodology - Section 9.4.3.1 Scoping the Cumulative Effects Assessment
Issue/Concern:	<p>In Section 9.4.3.1, the Proponent describes the conditions for a cumulative effects assessment as follows: <i>“Two conditions must be met to initiate an assessment of cumulative effects on a VC [Valued Component]:</i></p> <ul style="list-style-type: none"> • <i>The Project is assessed as having adverse residual environmental effects on a VC.</i> • <i>The adverse residual effects from the Project overlap spatially and temporally with residual effects of other projects or physical activities on a VC.”</i> <p>The two-condition framework for initiating a cumulative effects assessment (CEA) is reasonable, in principle. However, Volume 4 does not describe how the Proponent will communicate whether the conditions have been met for each VC. An explicit statement of whether the conditions have been triggered, and the basis for that determination, would support the later technical review.</p> <p>The second triggering condition requires that adverse residual effects from the Project overlap spatially and temporally with residual effects from other projects or physical activities. As written, this condition is ambiguous with respect to reasonably foreseeable future activities that have not yet occurred and for which residual effects cannot be estimated.</p>
Information Request:	<p>ECCC requests that the Proponent:</p> <ol style="list-style-type: none"> 1. Confirm that each VC assessment will include an explicit statement of whether the two CEA triggering conditions have been met or not, and the basis for that determination; and 2. Clarify how the second CEA triggering condition will be evaluated with respect to reasonably foreseeable future activities, including how residual effects from activities not yet underway will be estimated or characterized.

IR Source:	ECCC
IR Number:	ECCC-IR 29
IR Directed to:	Proponent
Subject:	Cumulative effects
Reference:	Grays Bay Road and Port Impact Statement (April 2026) Volume 4 Effects Assessment Methodology - Section 9.4.3.2 Identification of Other Projects and Activities
Issue/Concern:	In Section 9.4.3.2, the Proponent describes the temporal limit of the cumulative effects assessment (CEA) as follows: <i>“The temporal limit of the cumulative effects assessment has been selected at 20 years into the future, which is assumed as an approximate extent to which reasonably foreseeable</i>



	<p><i>future and induced development activities can be predicted with a level of certainty that allows for assessment."</i></p> <p>For a project with a 75-year design life, a 20-year temporal window for reasonably foreseeable induced (RFI) activities captures less than a third of the Project's operational period. For Valued Components (VCs) where Project residual effects are ongoing and long-term, such as persistent habitat disturbance along the road corridor, the interaction of those ongoing residual effects with other projects or activities does not stop at 2055. It is not clear how the CEA will address the potential for those ongoing effects to interact with projects or activities that emerge after the RFI window closes.</p> <p>Volume 4 states that the temporal limit of the CEA has been selected at 20 years into the future. Section 32 of Volume 10 clarifies that this 20-year span (2035–2055) applies specifically to the RFI scenario, and that the Project itself has a design life of 75 years extending to 2110. It is not clear from either volume whether the 20-year RFI window will be applied uniformly across all VC CEAs, or whether a longer assessment horizon may be warranted for some VCs given VC-specific ecological considerations including generation time and demographic recovery rates, migratory connectivity, habitat recovery timescales following disturbance, and population-level response lag times.</p>
Information Request:	<p>ECCC requests that the Proponent:</p> <ol style="list-style-type: none"> 1. Clarify, for VCs where residual Project effects persist beyond 2055, how the CEA addresses the potential for those ongoing effects to interact with projects or activities that emerge after the RFI temporal window closes; and 2. Confirm whether the 20-year RFI temporal window (2035–2055) will be applied uniformly across all VC CEAs, and if so, provide VC-specific rationale for its adequacy for VCs characterized by long recovery times or sustained sensitivity to disturbance, including with respect to generation time, demographic recovery rates, migratory connectivity, habitat recovery timescales, and population-level response lag times.

IR Source:	ECCC
IR Number:	ECCC-IR 30
IR Directed to:	Proponent
Subject:	Migratory Bird Local Assessment Area and Regional Assessment Area
Reference:	<p>Grays Bay Road and Port Impact Statement (April 2026) Volume 6 Terrestrial Environment - Section VS.6 Volume Summary – Scope of the Terrestrial EA</p> <p>Rodriguez et al. 2015. GPS tracking for mapping seabird mortality induced by light pollution. Scientific Reports 5, Article number: 10670. Available at: https://www.nature.com/articles/srep10670</p> <p>International Light Pollution Guidelines for Migratory Species (Convention on Migratory Species (CMS), February 2024). Available at:</p>



	<p>https://www.cms.int/sites/default/files/publication/cms_light_pollution_guidelines_complete_0.pdf</p>
<p>Issue/Concern :</p>	<p>In Section VS.6, the Proponent refers to the Local Assessment Area and Regional Assessment Area for birds as follows:</p> <p><i>“The Local Assessment Area (LAA) considers the maximum predicted extent of direct and indirect effects. For birds the LAA was defined as a 4km buffer around the Project Development Area (PDA). The Regional Assessment Area (RAA) provides a regional context for how project-related effects may influence valued components. For birds the RAA was defined as a 20 km buffer around the PDA.”</i></p> <p>The Terrestrial and Marine Local Assessment Areas (LAAs) for migratory birds are within important migration pathways for several marine bird species. The 4 km LAA buffer includes both “direct” and “indirect” effects, however, indirect effects likely extend beyond 4 km.</p> <p>This buffer does not capture known long-range disturbance pathways, including artificial light at night associated with port infrastructure and vessels. For example, the US Fish and Wildlife Service regularly cites light attraction at 5 km from the source. For some seabirds, attraction to lights can occur as far as 16 km from the source (Rodriguez et al. 2015).</p> <p>Information for migrating waterfowl is limited in the Arctic. While the impacts of lighting may be less relevant during summer due to extended daylight hours, it is likely to be important during fall migration, when fewer daylight hours and weather conditions increase the likelihood of light attraction. Appendix G of the International Light Pollution Guidelines for Migratory Species (CMS 2024) includes information specific to seabirds.</p> <p>Impacts on migratory birds are not geographically consistent across Project activities (i.e., the impact of some activities will have a greater geographic extent than others). A 4 km buffer may account for most direct effects but may not capture all indirect effects, including potential impacts of roads on hydrology and the subsequent impacts to bird habitat availability and quality, and the impacts of attraction and collisions due to artificial light at night, particularly during fall migration.</p>
<p>Information Request:</p>	<p>ECCC requests that the Proponent:</p> <ol style="list-style-type: none"> 1. Clarify whether different Project activities or impact pathways (e.g., noise, lighting, habitat alteration) were considered in defining the spatial extent of effects on migratory birds, and how these were incorporated into the selection of the LAA and RAA; and



	2. Provide the rationale and supporting references used to determine the spatial boundaries of the LAA and RAA for migratory birds.
--	---

IR Source:	ECCC
IR Number:	ECCC-IR 31
IR Directed to:	Proponent
Subject:	Zones of Influence for birds
Reference:	<p>Grays Bay Road and Port Impact Statement (April 2026) Volume 6 Terrestrial Environment</p> <ul style="list-style-type: none"> - Section VS.6.4.2 Project Effects - Section 17.4 Assessment of Project Effects on Birds - Table 17.10 Rationale for Disturbance Zones of Influence for Passerines, Waterbirds, Shorebirds, and Raptors <p>ECCC 2011. Reducing Impacts to Birds from Exploration and Research Projects on the Arctic Tundra. Canadian Wildlife Service Technical Report Series Number 522. <i>Available at:</i> https://publications.gc.ca/collections/collection_2014/ec/CW66-307-2012-eng.pdf</p>
Issue/Concern:	<p>The Impact Statement applies fixed Zone of Influence (ZOI) distances by bird guild (300 m for passerines, 250 m for waterbirds, and 1,500 m for cliff-nesting raptors), but the rationale and supporting evidence for these distances are unclear or insufficiently justified.</p> <p>The 250 m ZOI for waterbirds appears low, particularly in Arctic environments where disturbance distances are variable and often substantially greater.</p> <p>The assessment does not clearly demonstrate how ZOIs account for species-specific behaviour and sensitivity, differences among bird groups, or variation across development phases.</p> <p>The selected ZOI distances appear to be less precautionary than available regional and national guidance, including migratory bird setback guidance from the Nunavut Planning Commission (https://www.nunavut.ca/sites/default/files/table_2_-_migratory_bird_setbacks_0.pdf) and established setback distances for Arctic species such as geese, swans, loons, and cranes (ECCC 2011).</p> <p>Although references are cited in support of disturbance distances, it is unclear how these studies were selected, evaluated for relevance to the Project setting, and applied to justify the specific ZOI distances used in the assessment.</p> <p>Additional references:</p> <ul style="list-style-type: none"> • https://cdnscepub.com/doi/pdf/10.1139/as-2015-0029 • https://link.springer.com/content/pdf/10.1007/s00227-019-3624-z



	<ul style="list-style-type: none"> • https://bioone.org/journals/ardea/volume-97/issue-1/078.097.0112/Common-Eider-Somateria-mollissima-Feeding-Activity-and-the-Influence-of/10.5253/078.097.0112.full • https://doi.org/10.3389/fmars.2019.00192 • https://doi.org/10.1016/j.jenvman.2019.109511
Information Request:	<p>ECCC recommends the Proponent provide a detailed justification for the Zones of Influence used in the assessment of Project effects on birds, including:</p> <ol style="list-style-type: none"> 1. Rationale and Supporting Evidence <ol style="list-style-type: none"> a. Provide the rationale and supporting literature used to establish ZOI distances for each bird grouping. b. Describe how cited studies were selected and how they are applicable to Arctic conditions and the Project area. 2. Consideration of Species Variability <ol style="list-style-type: none"> a. Explain how species-specific responses to disturbance, including variability within and among bird groups, were considered in establishing ZOI distances. b. Identify whether any species or groups may require larger ZOIs than those applied. 3. Project Phase Consideration <ol style="list-style-type: none"> a. Clarify how ZOI distances account for differences in disturbance across Project phases. 4. Alignment with Guidance and Best Practices <ol style="list-style-type: none"> a. Describe how selected ZOI distances align with or differ from regional guidance. b. Where ZOI distances are less precautionary, provide justification.

IR Source:	ECCC
IR Number:	ECCC-IR 32
IR Directed to:	Proponent
Subject:	Residual effects characterization, vessel interactions, habitat availability, and monitoring for migratory birds
Reference:	<p>Grays Bay Road and Port Impact Statement (April 2026) Volume 6 Terrestrial Environment</p> <ul style="list-style-type: none"> - Section VS.6.4.2 Project Effects - Section 17.4.2.4 Project Residual Effects (Waterbirds) - Section 17.1.4.3 – Residual Effects Characterization <p>Artukhin 2026. Light-induced mortality of seabirds during the winter trawl fishery for pollock in the Sea of Okhotsk. 49, 16. https://link.springer.com/article/10.1007/s00300-026-03456-3</p>
Issue/Concern:	<p>The Impact Statement concludes that residual effects on birds are low, but the supporting rationale does not fully account for species-specific behaviour, temporal variability, habitat constraints, and uncertainty, particularly in relation to vessel activity, habitat availability, and threshold assumptions. Accurate characterization of residual effects is important to inform the scope and appropriateness of mitigation measures.</p> <ul style="list-style-type: none"> • The assessment assumes that interactions between birds and marine vessels will result in isolated mortality events affecting a small



	<p>number of individuals. However, responses to vessels vary among species; some species known to occur in the project area (e.g., gulls and fulmars) may be attracted to vessels, increasing interaction frequency, and repeated exposure within movement corridors (e.g., Coronation Gulf and Dease Strait) may result in cumulative effects (Artukhin 2026).</p> <ul style="list-style-type: none"> • The assessment does not fully consider the range of vessel-related pathways of effects beyond direct mortality, including injury, disturbance and displacement, contamination (e.g., oil spills), or indirect effects on fitness (e.g., reduced feeding, decreased body condition). • The assessment of seasonal risk related to marine vessel lighting may underestimate overlap with sensitive periods. Fall migration timing is broad and variable, with some species present from August through November. Limited and outdated data increase uncertainty. Some species (e.g., sea ducks, Common Eiders) remain in the area later than suggested and may be vulnerable during moulting (including flightless periods) and during migration under low-light conditions. Vessel lighting may increase risks of disorientation and collision, particularly in poor visibility. • Conclusions regarding low-magnitude residual effects on habitat assume that suitable habitat is available elsewhere in the RAA and that displaced individuals can be accommodated without consequence. However, this assumption is not demonstrated and species-specific habitat requirements and availability are not well characterized. Additionally, alternative habitat may already be occupied or limited. • The use of generalized habitat maintenance thresholds (10–30%) is not clearly justified. Thresholds should be species- and context-specific. Values derived from other systems (e.g., forest ecosystems) may not apply to Arctic, marine, or coastal birds. Species dependent on spatially constrained habitats (e.g., seabirds) may be disproportionately affected by small habitat losses. • There is limited information regarding how uncertainty and data limitations (e.g., outdated surveys, limited migration data, incomplete habitat characterization) were incorporated into residual effects conclusions.
<p>Information Request:</p>	<p>ECCC requests that the Proponent provide the following additional information and clarification to support the characterization of residual effects on migratory birds (including species at risk migratory birds):</p> <ol style="list-style-type: none"> 1. Provide justification for the conclusion that vessel interactions will result in only isolated mortality events affecting a small number of individuals; 2. Include consideration of a broader range of potential vessel-related pathways of effects, including attraction to vessels; and endpoint effects of injury, disturbance, displacement, contamination (e.g., oil spills), and indirect effects on survival and reproductive success;



	<ol style="list-style-type: none"> 3. Clarify how marine vessel lighting effects were assessed, including overlap with species-specific migration and moulting periods, and risks of disorientation and collision under varying environmental conditions; 4. Clarify how the assessment accounts for temporal variability in bird presence, including fall migration, moulting periods (including flightless stages), and brood-rearing periods. Describe how these periods of increased vulnerability were incorporated into residual effects conclusions; 5. Provide species-specific information on habitat availability and requirements within the RAA. Demonstrate whether habitat affected by the Project is functionally equivalent to habitat available elsewhere (i.e., habitat that is not already occupied or capacity-limited); 6. Clarify how displacement effects were considered in determining that residual habitat effects are low; 7. Provide rationale and additional supporting references for the use of habitat maintenance thresholds (e.g., 10–30%). Clarify how these thresholds are applicable to Arctic environments, coastal and marine bird species, and species with localized or spatially constrained habitat requirements; and 8. Describe how uncertainty and data limitations were incorporated into the residual effects assessment. Explain how these uncertainties influence confidence in the conclusion that residual effects are low.
--	--

IR Source:	ECCC
IR Number:	ECCC-IR 33
IR Directed to:	Proponent
Subject:	Wildlife sweeps, timing, methodology, and no-disturbance buffers for migratory birds
Reference:	<p>Grays Bay Road and Port Impact Statement (April 2026) Volume 6 Terrestrial Environment</p> <ul style="list-style-type: none"> - Section VS.6.4.5 Mitigation, Management, and Enhancement Measures - Section 17.4.2.4 – Project Residual Effects (Waterbirds) <p>ECCC Guidelines to Avoid Harm to Migratory Birds. Available at: https://www.canada.ca/en/environment-climate-change/services/avoiding-harm-migratory-birds/reduce-risk-migratory-birds.html</p>
Issue/Concern:	<p>It is unclear how much time may elapse between wildlife sweeps and the initiation of ground-disturbing activities, introducing the risk that nests may be initiated after sweeps are completed. While wildlife sweeps may help reduce risks, active nest searches are not generally recommended, as detection probability is often low and there is an increased risk of disturbing or damaging active nests.</p> <p>As detailed in ECCC's Guidelines to Avoid Harm to Migratory Birds, nest surveys to determine nest occupancy may only be appropriate when all these conditions are met:</p>



	<ul style="list-style-type: none"> • Conducted by skilled and experienced observers; • Using appropriate methodology; • Only a few nesting spots or a small community of migratory birds is expected; and • The activities will take place in simple habitats. <p>Proponents are reminded that migratory bird species may nest on the ground, in ground cavities, in grasses, shrubs, cliffs, trees, tree cavities and other sites and that nest sites are often cryptic or camouflaged, making them difficult to locate.</p> <p>It is unclear how the no-disturbance buffers that were identified by the Proponent will be defined and applied, what constitutes “sensitive wildlife features”, and whether wildlife sweep methods and intensity will vary by habitat.</p>
Information Request:	<p>ECCC requests that the Proponent provide the following additional detail regarding the implementation of wildlife sweeps and associated mitigation measures:</p> <ol style="list-style-type: none"> 1. Confirm the maximum allowable time interval between completion of wildlife sweeps and commencement of ground-disturbing activities; 2. Describe how risks associated with nest initiation between sweeps and activities will be managed; 3. Provide detailed information on the methods used to conduct wildlife sweeps, including survey design (e.g., spacing/distance between observers), tools and equipment used, qualifications and experience required for observers, and any limitations; 4. Describe any habitat-specific modifications to survey methods (e.g., increased effort in wetlands or complex habitats); 5. Describe how no-disturbance buffers will be determined and applied; 6. Provide examples of “sensitive wildlife features” that would trigger buffer implementation; and 7. Clarify whether buffer distances will vary by species, habitat type, activity type.

IR Source:	ECCC
IR Number:	ECCC-IR 34
IR Directed to:	Proponent
Subject:	Mitigation and management measures
Reference:	<p>Grays Bay Road and Port Impact Statement (April 2026) Volume 6 Terrestrial Environment - Section VS.6.4.2 Project Effects</p>
Issue/Concern:	<p>In Section VS.6.4.2, the Proponent states that “<i>Risk of mortality is considered low magnitude... and the implementation of mitigation and management measures are expected to be highly effective.</i>”</p> <p>It is unclear what mitigation and management measures will be implemented, as there were no clear references to support the proposed measures.</p>



Information Request:	ECCC requests that the Proponent provide additional information on: <ol style="list-style-type: none"> 1. Mitigation measures proposed to address this effect; 2. Why the proposed mitigation measures are expected to be highly effective, including any references that demonstrate the proposed mitigations to be highly effective; and 3. Where available, confirm if any planned mitigation measures have been demonstrated as highly effective in Arctic environments.
IR Source:	ECCC
IR Number:	ECCC-IR 35
IR Directed to:	Proponent
Subject:	Bird groupings and consistency across the draft Impact Statement
Reference:	Grays Bay Road and Port Impact Statement (April 2026) Volume 6 Terrestrial Environment <ul style="list-style-type: none"> - Section 17 – Assessment of Potential Effects on Birds <ul style="list-style-type: none"> - Section 17.2.2.7 and Figure 17.4 - Appendix 17A Bird Baseline Report <ul style="list-style-type: none"> - Section 2.1 Selection of Indicator Species - Section 2.4.3 Tundra Breeding Bird Surveys
Issue/Concern:	<p>The Impact Statement and supporting Bird Baseline Report apply inconsistent and overly broad bird groupings, particularly with respect to the use of the term “waterbirds.” The following issues were noted:</p> <ul style="list-style-type: none"> • In Section 17, “waterbirds” are defined broadly as including seabirds, shorebirds, and waterfowl despite substantial differences in ecology and habitat use, nesting strategies, foraging behaviour and sensitivity to disturbance; • In other sections, including baseline reporting, shorebirds are treated as a distinct group, creating inconsistencies across documents; • The term “waterbird habitat” is used in cases where the analysis appears to apply specifically to shorebirds, causing ambiguity in interpretation (e.g., Section 17.2.2.7 and Figure 17.4); • The grouping approach assumes that outcomes are “broadly applicable to most guild members” but does not identify exceptions despite known ecological variability among species. • It is unclear how differences among these groups were incorporated into disturbance assessments (e.g., Zone of Influence (ZOI) distances) and habitat suitability modelling and mapping outputs; • Habitat suitability statements (e.g., limited “waterbird” habitat) may be misleading. Different bird groups require different habitat types and habitat types may be used at varying densities during different life stages; • It is unclear whether habitat suitability information is available or considered for all waterbird groups (e.g., seabirds, waterfowl, sea ducks), or only subsets such as shorebirds; • Figures and mapping products (e.g., Figure 17.4) do not clearly indicate the ZOI for “waterbirds” or whether analyses are specific to a subset of this grouping (e.g., shorebirds); and



	<ul style="list-style-type: none"> • Additional ambiguity exists in definitions of groupings (e.g., “upland game species”) and their relationship to other categories used throughout the Impact Statement and appendices.
Information Request:	<p>ECCC requests that the Proponent provide clarification and revisions regarding bird groupings used throughout the Impact Statement and supporting documents, including:</p> <ol style="list-style-type: none"> 1. Rationale for Groupings <ol style="list-style-type: none"> a. Clarify the rationale for grouping seabirds, shorebirds, and waterfowl into a single “waterbird” guild in the effects assessment. b. Confirm whether these groups will be assessed and analyzed separately, given their ecological differences. 2. Consistency Across Documents <ol style="list-style-type: none"> a. Ensure consistent bird group definitions and terminology across the Impact Statement, Bird Baseline Report, and all appendices. b. Explain discrepancies where different groupings are used (e.g., shorebirds treated separately in baseline studies but grouped as “waterbirds” in the Impact Statement). c. Define terms such as “upland game species.” 3. Application in Effects Assessment <ol style="list-style-type: none"> a. Describe how variation in behaviour, habitat use, and disturbance sensitivity among seabirds, shorebirds, and waterfowl was incorporated into effects predictions, Zone of Influence (ZOI) distances, and habitat suitability modelling. b. Identify any species or groups that are exceptions to conclusions described as “broadly applicable to most guild members.” 4. Habitat Suitability and Interpretation <ol style="list-style-type: none"> a. Clarify the intended meaning of “waterbird habitat” in Section 17.2.2.7 and elsewhere. b. Confirm whether habitat suitability analyses apply to all waterbird groups, or are specific to subsets (e.g., shorebirds). c. Provide information on habitat suitability for all relevant bird groups (e.g., seabirds, waterfowl, sea ducks), where available. d. Revise or clarify statements regarding habitat availability to reflect that habitat requirements differ among groups and multiple habitat types contribute to supporting migratory birds across life stages. 5. Clarification of Mapping and Analysis <ol style="list-style-type: none"> a. Clarify whether “waterbird habitat” and associated modelling (e.g., Figure 17.4) apply to all waterbirds, or specific subgroups (e.g., shorebirds only) b. Clearly identify or include mapping of the Waterbird ZOI (e.g., within Figure 17.4 or via inset).

IR Source:	ECCC
IR Number:	ECCC-IR 36



IR Directed to:	Proponent
Subject:	Project interaction with marine birds
Reference:	<p>Grays Bay Road and Port Impact Statement (April 2026) Volume 6 Terrestrial Environment</p> <ul style="list-style-type: none"> - Section 17 Assessment of Potential Effects on Birds - Section 17.1.3 Potential Effects, Pathways, and Measurable Parameters <p>Weiser and Powell 2010. Does garbage in the diet improve reproductive output in Glaucus Gulls? 112(3) 530-538. https://doi.org/10.1525/cond.2010.100020</p> <p>Dickson 2012. Seasonal movement of Pacific Common Eiders breeding in Arctic Canada. Canadian Wildlife Service, Technical Report Series 521. https://publications.gc.ca/site/eng/9.573220/publication.html</p>
Issue/Concern:	<p>In Section 17.1.3, the Proponent states: “<i>The Project’s primary interaction with marine birds will be the marine habitat shoreline at the Grays Bay port.</i>” This statement does not reflect the spatial ecology of marine bird species. Interactions with marine birds at the shoreline and port area are not limited to species already present in that area. For example, Glaucous Gulls often forage 30 to 70 km from their colony or nest (Weiser and Powell 2010). This species is attracted to vessel activities, landfills, and other anthropogenic sources. Additionally, marine birds may use nearshore and/or offshore marine environments for foraging, staging, and transit. Because Project activities extend beyond the shoreline and port (e.g., shipping), interactions would also extend beyond the shoreline and port. For example, large concentrations of Common Eiders breed, nest, moult, stage, and migrate throughout this region, including in the LSA and RSA, from June through mid-October. There is potential for disturbance from vessel traffic during sensitive periods.</p> <p>There is limited data on marine bird species in this area and the Impact Statement does not include references that provide information on interactions between marine birds and vessels in the region.</p>
Information Request:	<p>ECCC requests that the Proponent:</p> <ol style="list-style-type: none"> 1. Clarify what is considered by “marine habitat shoreline” and indicate if this is a specific distance from the coastline; 2. Clarify how shipping corridors were considered when assessing Project effects on marine birds; and 3. Provide information on how the magnitude of effects on marine migratory birds were assessed for the road during the Construction and Operations and Maintenance phases.

IR Source:	ECCC
IR Number:	ECCC-IR 37
IR Directed to:	Proponent
Subject:	Spatial boundary for measured effects
Reference:	<p>Grays Bay Road and Port Impact Statement (April 2026) Volume 6 Terrestrial Environment</p> <ul style="list-style-type: none"> - Section 17.1.4.1 Spatial Boundaries



Issue/Concern:	In Section 17.1.4.1, the Proponent refers to the Local Assessment Area (LAA) as the "... <i>maximum predicted extent of project-related environmental effects, both direct and indirect, on wildlife and birds that can be predicted or measured...</i> " and the Zone of Influence (ZOI) as "... <i>the distance within which human activities may alter bird behaviour or habitat use</i> ". It is unclear why the ZOI is not larger, and closer to the LAA, given that the LAA is the actual extent of Project-related effects within which effects can be measured.
Information Request:	ECCC requests that the Proponent clarify why the ZOIs for migratory birds are small relative to the overall LAA, which is the extent within which Project effects can be measured.

IR Source:	ECCC
IR Number:	ECCC-IR 38
IR Directed to:	Proponent
Subject:	Defining acceptable levels of adverse change
Reference:	Grays Bay Road and Port Impact Statement (April 2026) Volume 6 Terrestrial Environment - Section 17.1.5 Significance Determination
Issue/Concern:	In Section 17.1.5, the Proponent defines a significant adverse residual effect on birds as "... <i>a residual effect that is expected to result in an adverse change to bird population viability and persistence, of bird populations that interact with the RAA, beyond an acceptable level.</i> " It is unclear what would be considered an "acceptable" level of adverse residual effect on birds.
Information Request:	ECCC requests that the Proponent clarify what is considered an "acceptable" level of adverse residual effect on birds.

IR Source:	ECCC
IR Number:	ECCC-IR 39
IR Directed to:	Proponent
Subject:	Relevance of previous Arctic PRISM plots for bird monitoring
Reference:	Grays Bay Road and Port Impact Statement (April 2026) Volume 6 Terrestrial Environment - Section 17.2.1.3 Field Studies



Issue/Concern:	<p>In Section 17.2.1.3, the Proponent provides an overview of bird surveys, including the following:</p> <p><i>“In 2008 and 2012, the Program for Regional and International Shorebird Monitoring (PRISM) Rapid Plot method was implemented to better capture uncommon shorebird species and was effective for documenting nearly all breeding bird species in tundra environments.”</i></p> <p>There are other years of relevant Arctic PRISM data in the project area that could contribute to baseline information about the Regional Assessment Area (RAA). These data are now available at the Government of Canada’s Open Government website (https://open.canada.ca/data/en/dataset/16e8ad1c-ba02-4438-87d2-969153694e88).</p> <p>It is unclear whether additional Arctic PRISM survey data were used to inform the Impact Statement. ECCC can provide further information regarding Arctic PRISM surveys for the Grays Bay Road and Port Project.</p>
Information Request:	<p>ECCC requests that the Proponent clarify whether additional Arctic PRISM data were considered when assessing Project effects to migratory birds and whether it will be used for any revised analyses in the final Impact Statement.</p>

IR Source:	ECCC
IR Number:	ECCC-IR 40
IR Directed to:	Proponent
Subject:	Habitat suitability methods, interpretation, and application for birds
Reference:	<p>Grays Bay Road and Port Impact Statement (April 2026) Volume 6 Terrestrial Environment</p> <ul style="list-style-type: none"> - Section 17.2.2.7 Waterbird Habitat Rating - Section 17.4.1.1 Analytical Assessment Techniques
Issue/Concern:	<p>The habitat suitability assessment presented in the Impact Statement lacks clarity and sufficient justification regarding methodology, interpretation of results, and consistency of application across bird groups. The following issues were noted:</p> <ul style="list-style-type: none"> • Habitat suitability ratings for “waterbirds” are described as reflecting shorebird breeding habitat only, despite the broader use of the term elsewhere in the Impact Statement, leading to ambiguity in interpretation; • Statements indicating a low amount of suitable habitat may be misleading, as different bird groups rely on different habitat types and birds may use a range of habitats at varying densities across life stages. The assessment appears to emphasize wet habitat types, rather than overall habitat availability; • The methods used to define habitat suitability vary across groups. Passerine habitat ranking is based on bird density and waterbird habitat ranking is based on habitat characteristics (shorebirds only); • The use of bird density as a proxy for habitat suitability is uncertain and may be unreliable due to territorial behaviour limiting observed



	<p>densities, source–sink dynamics, and interannual variability (e.g., food availability, environmental conditions); and</p> <ul style="list-style-type: none"> It is unclear what data were used to define current baseline conditions or how those data were analyzed. It is also unclear whether detection probabilities were accounted for in estimating densities or whether habitat suitability assessments were completed consistently for all relevant bird groups (e.g., seabirds, waterfowl)
Information Request:	<p>ECCC requests that the Proponent provide clarification and additional information regarding habitat suitability assessments used to support the evaluation of Project effects on birds as follows:</p> <ol style="list-style-type: none"> 1. Confirm when data were collected to characterize current habitat conditions within the Local Assessment Area (LAA) and Regional Study Area (RSA). Describe how these data were analyzed to determine habitat suitability rankings; 2. Confirm whether habitat suitability assessments have been conducted for all relevant bird groups, including passerines, shorebirds, seabirds, waterfowl / sea ducks. Where methods differ among groups (e.g., density-based vs. habitat-based approaches), provide justification for the selected methods; 3. Provide justification for the use of bird density as an indicator of habitat suitability for passerines. Clarify data sources used to estimate densities and whether densities were derived from single-year or multi-year datasets. Confirm whether detection probabilities were accounted for in estimating bird densities (e.g., variation due to date, time, observer distance, habitat type). If not, provide justification and describe how this limitation influences interpretation of habitat suitability; 4. Clarify the intended meaning of “waterbird habitat” in Section 17.2.2.7 and confirm whether this analysis applies broadly to all waterbirds, or specifically to shorebirds only; 5. Revise or clarify statements describing low habitat availability, ensuring statements reflect differences in habitat requirements among bird groups and acknowledge the role of multiple habitat types across life stages; and 6. Confirm whether information is available on suitable habitat for other bird groups (e.g., seabirds, waterfowl), and how these were considered in the assessment.

IR Source:	ECCC
IR Number:	ECCC-IR 41
IR Directed to:	Proponent
Subject:	Mitigation efficacy
Reference:	<p>Grays Bay Road and Port Impact Statement (April 2026) Volume 6 Terrestrial Environment - 17.4.2.4 Project Residual Effects</p>
Issue/Concern:	<p>In Section 17.4.2.4, the Proponent states that “<i>The efficacy of the proposed mitigations is high when implemented throughout the project life.</i>”</p> <p>It is unclear if there are references that support high effectiveness of proposed mitigations, particularly in Arctic environments.</p>



Information Request:	ECCC requests that the Proponent clarify what references support high efficacy of the proposed mitigations, particularly in Arctic environments, and identify monitoring and adaptive management considerations for ensuring efficacy of mitigation measures.
-----------------------------	---

IR Source:	ECCC
IR Number:	ECCC-IR 42
IR Directed to:	Proponent
Subject:	Project influence on important migratory bird and species and at risk migratory bird breeding areas
Reference:	Grays Bay Road and Port Impact Statement (April 2026) Volume 6 Terrestrial Environment - Section 17.8 Prediction Confidence and Uncertainty – Baseline Data Dickson 2012. Seasonal movement of Pacific Common Eiders breeding in Arctic Canada. Canadian Wildlife Service, Technical Report Series 521. https://publications.gc.ca/site/eng/9.573220/publication.html
Issue/Concern:	In Section 17.8, the Proponent discusses baseline data for the bird community, noting: “ <i>No bird breeding colonies were identified in proximity to the PDA [Project Development Area]; therefore, no concerns that the Project will influence any important bird breeding areas.</i> ” There is insufficient survey effort to confirm no important bird breeding areas in proximity to the PDA. For example, Common Eiders have been observed staging within the Regional Assessment Area (RAA) during migration (Dickson 2012). Although available information does not indicate major seabird colonies in the region (e.g., colonies in the thousands), gulls and terns may nest in this area in low densities.
Information Request:	ECCC requests that the Proponent confirm if other important breeding areas are in proximity to the PDA, including areas used by non-colony breeding species.

IR Source:	ECCC
IR Number:	ECCC-IR 43
IR Directed to:	Proponent
Subject:	Habitat evaluation assumptions
Reference:	Grays Bay Road and Port Impact Statement (April 2026) Volume 6 Terrestrial Environment - Section 17.8 Prediction Confidence and Uncertainty – Baseline Data
Issue/Concern:	In Section 17.8, the Proponent states: “ <i>However, conservative assumptions made in the habitat evaluation are likely to result in an overestimate of the overall habitat effect.</i> ” It is unclear what conservative assumptions were made in the habitat evaluation.



Information Request:	ECCC requests that the Proponent clarify what conservative assumptions were made in the habitat evaluation.
-----------------------------	---

IR Source:	ECCC
IR Number:	ECCC-IR 44
IR Directed to:	Proponent
Subject:	Mitigation effectiveness
Reference:	Grays Bay Road and Port Impact Statement (April 2026) Volume 6 Terrestrial Environment - Section 17.8 Prediction Confidence and Uncertainty – Success of mitigation
Issue/Concern:	In Section 17.8, the Proponent refers to their confidence in the mitigation measures as follows: <i>“There is high confidence in the success of the mitigation and management measures outlined, as well as in the monitoring practices, based on their proven effectiveness in other projects and on information from the literature.”</i> It is unclear what mitigation measures have proven effective in other projects and from the literature.
Information Request:	ECCC requests that the Proponent clarify which mitigation measures have been proven effective in other projects and from the literature.

IR Source:	ECCC
IR Number:	ECCC-IR 45
IR Directed to:	Proponent
Subject:	Location of northern and southern demarcation in Figure 2.1
Reference:	Grays Bay Road and Port Impact Statement (April 2026) Volume 6 Terrestrial Environment - Appendix 17A Birds Baseline Report - Figure 2.1 Aerial Inland Waterfowl Survey Transects in the Terrestrial RSA for the years 2008 and 2012
Issue/Concern:	Various volumes of the Impact Statement reference the “northern half” and “southern half” of the Regional Assessment Area (RAA).
Information Request:	ECCC requests that the Proponent confirm if the demarcation in Figure 2.1 represents what are considered the northern and southern halves of the RAA throughout all volumes of the Impact Statement.

IR Source:	ECCC
IR Number:	ECCC-IR 46
IR Directed to:	Proponent
Subject:	Autonomous Recording Unit (ARU) bird survey methods
Reference:	Grays Bay Road and Port Impact Statement (April 2026) Volume 6 Terrestrial Environment - Appendix 17A Birds Baseline Report - Section 2.4.3 Tundra Breeding Bird Surveys – 2025 Field Surveys



Issue/Concern:	In Section 2.4.3, the Proponent describes the use of Autonomous Recording Units (ARUs) as follows: “ARUs were programmed to record during the first 5 minutes of every 30-minute interval, 24 hours a day, from May 15 to August 15.” Three recordings from separate days that did not contain excessive noise were selected for acoustic and visual examination. It is unclear what dates or seasons are represented by the selected recordings used for these analyses. Additionally, it is not clear whether any data filtering was used, or whether recordings were analyzed using automated recognition software or human observers. Without these details, CWS cannot assess the relevance of findings reported by the Proponent.
Information Request:	ECCC requests that the Proponent confirm the dates used for selected recordings and whether selected recordings were analyzed by human observers or automated recognizers and describe any data filtering or processing methods applied.

IR Source:	ECCC
IR Number:	ECCC-IR 47
IR Directed to:	Proponent
Subject:	Relevance of historical ecological land classification developed for the Izok Corridor Project
Reference:	Grays Bay Road and Port Impact Statement (April 2026) Volume 6 Terrestrial Environment - Appendix 17A Birds Baseline Report - Section 2.5 Habitat Ratings
Issue/Concern:	In Section 2.5 of the Birds Baseline Report, the Proponent indicates that “Habitat ratings were completed for peregrine falcon and shorebirds and created based on the ecological land classification (ELC) developed for the Izok Corridor Project (2013) that was adapted for use in support of this Project.” It is unclear if there are more recent ecological land classification data available for the project area.
Information Request:	ECCC requests that the Proponent confirm if there are more recent land classification data available for the Project area to inform current conditions in the RAA. If there are more recent land classification data, please confirm whether they will be used in updated analyses, or provide the rationale for not using the data.

IR Source:	ECCC
IR Number:	ECCC-IR 48
IR Directed to:	Proponent
Subject:	Area of survey coverage for aerial survey transects for birds in September 2012



Reference:	Grays Bay Road and Port Impact Statement (April 2026) Volume 6 Terrestrial Environment <ul style="list-style-type: none"> - Appendix 17A Birds Baseline Report <ul style="list-style-type: none"> - Figure 4.4 Seabird Concentrations Observed in the Marine Regional Study Area During the Extensive Aerial Survey Transects in September 2012 (Specifically, the mouth of the Bathurst Inlet)
Issue/Concern:	There appears to be a significant area that was not part of the September 2012 aerial surveys. Seabirds use this area, including observations of Arctic Terns, Glaucous Gulls, Iceland/Thayer's Gulls, and potentially other species of seabirds. Small colonies (e.g., 20-100 gulls) have been observed in Bathurst Inlet. Bathurst Inlet is an important breeding area for sea ducks (e.g., Common Eiders, King Eiders, and Long-tailed Ducks). It is unclear why the area is not included, as this is where the majority of breeding sea ducks would occur, which would then move through the RSA during spring and Fall migration and staging.
Information Request:	ECCC requests that the Proponent clarify their rationale for not conducting aerial survey transects over the Bathurst Inlet.

For information only – no response needed

IR Source:	ECCC
IR Number:	N/A
IR Directed to:	N/A
Subject:	Migratory Birds Convention Act and Migratory Bird Regulations
Reference:	Grays Bay Road and Port Impact Statement (April 2026) Volume 6 Terrestrial Environment <ul style="list-style-type: none"> - Table 17.1 Federal Legislation Applicable to the Assessment of Birds
Issue/Concern:	In Table 17.1, the Proponent refers to the <i>Migratory Birds Convention Act</i> as follows: “According to the Act, removal of migratory birds, their eggs, or nests from a site is only permissible if the migratory birds are causing or may cause damage to property and equipment (subject to permitting).” There is a lack of clarity and accuracy provided in the text related to conditions when the removal of a migratory bird nest or egg could be authorized through permitting. Permitting the removal of migratory birds, their eggs, or nests from a site requires several permitting conditions to be met. Damage or Danger permits are meant for specific situations where the bird is causing danger to human health or public safety or damage to the use of land or agricultural interest. Information on Damage or Danger permits is available here: https://www.canada.ca/en/environment-climate-change/services/migratory-bird-permits/damage-danger.html .
Information Request:	N/A



IR Source:	ECCC
IR Number:	N/A
IR Directed to:	N/A
Subject:	<i>Species at Risk Act (SARA)</i>
Reference:	Grays Bay Road and Port Impact Statement (April 2026) Volume 6 Terrestrial Environment - Section 17 Assessment of Potential Effects on Birds - Table 17.1 Federal Legislation Applicable to the Assessment of Birds
Issue/Concern:	<p>Misleading information regarding the application of the SARA.</p> <p>In Table 17.1, the Proponent states “<i>For wildlife listed under the SARA, a federal recovery strategy or action plan is required for that species, which identifies their critical habitat for the SARA’s general prohibitions to apply on non-federal lands.</i>”</p> <p>For wildlife species listed under SARA as endangered, threatened, or extirpated, a federal recovery strategy and, where appropriate, an action plan must be developed. For species listed as special concern, a management plan is required. Recovery strategies and action plans identify, to the extent possible, the species’ critical habitat, which is the habitat necessary for the survival and recovery of a species. The SARA also prohibits the destruction of critical habitat or impacts to individuals of the species on federal lands, unless the activity is determined not to jeopardize survival and recovery of the species and is permitted under SARA s. 73.</p> <p>Under the federal SARA, general prohibitions apply anywhere in Canada for migratory birds that are protected by the <i>Migratory Birds Convention Act</i>, 1994. These general prohibitions make it an offence to:</p> <ul style="list-style-type: none"> • kill, harm, harass, capture, or take an individual of a species listed as endangered, threatened, or extirpated; to possess, collect, buy, sell, or trade an individual or any part or derivative of such an individual (SARA s. 32); or • to damage or destroy the residence of one or more individuals (e.g., a nest) (SARA s. 33). <p>Additionally:</p> <ul style="list-style-type: none"> • Where critical habitat identified in a recovery document has been protected through a critical habitat protection order, that habitat, the habitat’s functions, features, and attributes are also protected (SARA s. 58). <p>More information regarding the SARA is available here: https://www.canada.ca/en/environment-climate-change/services/species-risk-education-centre/your-responsibility/your-responsability-guide.html.</p>
Information Request:	N/A

IR Source:	ECCC
IR Number:	N/A



IR Directed to:	N/A
Subject:	Updates to bird species status
Reference:	Grays Bay Road and Port Impact Statement (April 2026) Volume 6 Terrestrial Environment <ul style="list-style-type: none"> - Appendix 17A Birds Baseline Report <ul style="list-style-type: none"> - Table 3.2 Status of Bird Species Confirmed or Potentially Present in the Terrestrial Study Area - Snowy Owl and Barrow's Goldeneye
Issue/Concern:	Species' statuses indicated in the Birds Baseline Report are not current. The Snowy Owl has been assessed by the Committee on the Status of Endangered Wildlife (COSEWIC) and is under consideration for addition to Schedule 1 of the <i>Species at Risk Act</i> (SARA) as 'Threatened'. Barrow's Goldeneye is listed under the SARA as 'Special Concern'.
Information Request:	N/A

Natural Resources Canada (NRCan)

IR Source:	NRCan
IR Number:	NRCan-IR 01
IR Directed to:	Proponent
Subject:	Thermal analysis to assess changes in permafrost and ground stability due to the Project and assessment of impacts over the operating lifetime under a changing climate.
Reference:	Vol. 5 (sec. 5.3, 12.5, App. 12B); Vol. 6 (sec. 14.1, 14.2, 14.3, App. 14A); Vol. 10 (sec. 35)
Issue/Concern:	Disturbance to the ground surface and construction of the road can lead to changes in the ground thermal regime resulting in warming of the ground and thawing of permafrost. Where sediments are ice-rich, thawing can cause ground surface settlement and formation of ponds and result in ground instability with impacts on road performance. Climate warming can also result in warming and thawing of permafrost with implications for terrain stability and infrastructure integrity. Knowledge of the amount of permafrost thaw and ground settlement that will occur over the Project's lifetime is required for planning maintenance activities and assessment of granular resources required for the embankment to ensure optimal operation. An analysis of impacts of climate change on permafrost extent is presented in Vol. 5 (App. 12B) that uses an extreme warming scenario. However, the conclusions made by the authors of the report cited are misleading and misinterpreted. The approach utilized is also inadequate for determining the required information regarding changes in thaw depths and the resulting changes to material strength and potential ground subsidence over the Project lifetime. The potential impacts related to changes in permafrost conditions have been qualitatively described in Vol. 6-14.3.2 and Vol. 10-35. However, the Impact Statement does not appear to present any analysis regarding the expected change in thaw depth and ground settlement that may be expected for typical materials along the road corridor and in the port area. NRCan realizes that more detailed site-specific thermal analysis is normally conducted at a more advanced design stage, but it is unclear whether any preliminary quantitative analysis has



	been conducted or what the Proponent's plans are for thermal analysis as design progresses.
Information Request:	NRCan recommends that the Proponent provide: Information on any preliminary thermal analysis conducted to determine changes in thaw depth and resulting ground subsidence and stability over the Project lifetime. Information on plans for thermal analysis as design progresses.
IR Source:	NRCan
IR Number:	NRCan-IR 02
IR Directed to:	Proponent
Subject:	Location of potential borrow (granular) resource sites and assessment of ground ice conditions.
Reference:	Vol. 2 (sec. 2.6, 2.4); Vol. 6 (sec. 14.2, App. 14A); Vol 11 (App. 37H Att. H1)
Issue/Concern:	<p>Granular resources will be required for construction and ongoing maintenance of the road and other infrastructure related to the Project. The Proponent has indicated that quarries and borrow sites will be required approximately every 7 km along the 230 km road corridor with every third one providing a permanent source of material to provide 50,000 -100,000 m³ of granular material annually for road maintenance (Vol. 2, Table 2.10; section 2.6.3.3). The Proponent has indicated that sand and gravel will be sourced from eskers or other glaciofluvial materials to the extent available (Vol. 2 – 2.6.2.4), although elsewhere in Vol. 2 (2.1.1) the Impact Statement states that the use of eskers and glaciofluvial materials would be minimized to reduce impacts on habitat. NRCan notes that glaciofluvial deposits including eskers can be ice-rich (e.g., Dredge et al., 1999) and the potential for massive ice can affect the amount of excavation required to meet granular resource needs and potentially increase the footprint of the borrow area. The Proponent has indicated that selection of borrow sites will depend on geotechnical and geochemical conditions and proximity to the road and that investigations to characterize material properties will be conducted prior to development to identify suitable material (Vol. 2 – 2.6.2.4; Vol. 11 – att. H1). NRCan did not see any preliminary identification of potential granular resource areas in the project area based on the terrain mapping and existing information that the Proponent utilized to characterize surficial material in the project area. It is therefore not clear whether the Proponent has identified potential areas for granular material on which they will focus their future site investigations and to provide an understanding of the potential impacts of resource extraction.</p> <p>Reference: Dredge, L.A., Kerr, D.E., and Wolfe, S.A. 1999. Surficial materials and related ground ice conditions, Slave Province, N.W.T., Canada. Canadian Journal Earth Science, 36: 1227-1238.</p>
Information Request:	NRCan recommends that the Proponent provide: Clarification regarding the potential of sand and gravel to be sourced from eskers and other glaciofluvial deposits. Clarification regarding whether the Proponent has conducted a preliminary identification of potential sources of granular material, and if so, provide any reports related to their identification.



IR Source:	NRCan
IR Number:	NRCan-IR 03
IR Directed to:	Proponent
Subject:	Potential for icing (aufeis) along the road corridor and related impacts, including road hazards, drainage, and water accumulation.
Reference:	Vol. 5 (sec. 12.5 App. 12A, 12B); Vol. 6 (sec. 14.2, 14.3 App. 14A); Vol. 10 (sec. 35); Vol. 11 (App. 37A)
Issue/Concern:	Icings (or aufeis) can occur when water flowing through unfrozen ground, such as the active layer or a talik, or bedrock fractures is forced to the ground surface (e.g., encounters frozen ground conditions) and freezes. Successive overflows can result in large accumulations of ice. These ice accumulations can block drainage (e.g., culverts) which can result in water accumulation adjacent to the road in spring as well as flooding of the road. Icings can also present a road hazard if the ice accumulation extends across the road surface. Although icings occur naturally in permafrost terrain, they can also form due to the presence of the road embankment as the active layer can freeze beneath the embankment earlier than the adjacent natural terrain. Increases in active layer thickness and changes to subsurface water flow due to climate warming can also enhance the potential for icings. Although the Impact Statement briefly mentions the potential impacts of icing with respect to blockage of culverts, there is limited information regarding the potential impacts as a road hazard (e.g. Vol. 5 App. 12A-5.5). The Proponent indicates that no spatial data is currently available to inform an assessment of potential icing occurrence (App. 14A-4.4.1.6). NRCan assumes that the icings identified on the terrain maps in App. 14A (App. E) are from one of the information sources cited that was used to inform the description of baseline terrain conditions (Morse et al., 2023) for which the imagery used was during a time of year not appropriate for identifying the full extent of icing occurrence. NRCan notes that there are areas of seepage and/or high-water table identified on the terrain maps which could represent potential icing locations. It is unclear what the Proponent's plans are to identify areas of potential icing and refine assessments of impacts on road operation and the adjacent environment.
Information Request:	NRCan recommends that the Proponent provide: Any information on plans to better identify potential icing occurrences and assess their impacts, and to inform advanced project design.

IR Source:	NRCan
IR Number:	NRCan-IR 04
IR Directed to:	Proponent
Subject:	Terrain and permafrost conditions at approaches to water course crossings.
Reference:	Vol. 2 (sec. 2.1, 2.2, 2.6); Vol. 7 (sec. 19, App, 19A); Vol. 6 (App. 14A-app. E)
Issue/Concern:	More than 80 water course crossings will be required along the proposed corridor, of which 18 have been identified as major crossings requiring structures with a span greater than 5 m (Vol. 2-2.6.2.3). Knowledge of permafrost and terrain conditions at approaches to the major crossings is



	<p>essential to inform design in order to ensure infrastructure integrity and mitigate effects related to slope instability or erosion. Warmer ground conditions can be found adjacent to streams and rivers and for larger water bodies, taliks can be present beneath them. The Proponent has assessed the potential for taliks beneath water bodies and estimate that 7 of the major bridge crossings are within areas where open taliks exist (Vol. 7-19.3.4, fig. 19.8, 19.9). The warmer ground conditions at these crossings and their approaches are important considerations in determining terrain stability especially on sloping terrain. NRCan notes that thermokarst terrain has been identified at some crossings (e.g., Hood River; Vol. 6 App. 14A-app. E) indicating thaw unstable material. While the Proponent has acknowledged that there is potential for ground instability, slumping and slope failures at water course crossings, no information has been provided regarding any planned analysis to be done to better assess terrain stability at water course crossings and their approaches. It also is not clear what instrumentation (e.g., thermistors, piezometers, slope inclinometers) might be installed to monitor ground stability at approaches to water crossings).</p>
Information Request:	<p>NRCan recommends that the Proponent provide: Information on plans for stability assessments to be conducted at approaches to water course crossings (especially major ones) to inform advanced design and development of mitigation plans. Information on proposed instrumentation to be used to monitor ground stability at major water course crossings to inform mitigation planning to respond to issues such as slope instability or slumping.</p>

IR Source:	NRCan
IR Number:	NRCan-IR 05
IR Directed to:	Proponent
Subject:	Nearshore sediments and mobility
Reference:	Vol. 8 (sec. 21.3, 22.3, 23.3, App. 21A, App. 22A)
Issue/Concern:	<p>The Proponent indicates that the seabed in the port and small craft harbour areas is composed of a wide variety of materials from bedrock to silt and mud (8-App21A-5.4; 8-App. 22A-5.2). The Proponent indicates that dredging and blasting will be conducted during construction to create platforms for port and harbour infrastructure and that no ongoing maintenance dredging is expected in Operations and Maintenance Phases (8-21.3.2.4). The presence of silt and mud indicates parts of the port and harbour areas have been and possibly are depositional with a potential source of sediment from the Koglokoakyok (Kennarctic) River. The Proponent does not indicate that sediment discharge from the Koglokoakyok River has been considered, nor deposition rates in the project area determined. While the Proponent has collected some current meter data useful for sediment transport analyses, these do not appear to have been conducted for the port and harbour facilities.</p>
Information Request:	<p>NRCan recommends that the Proponent provide: Information and reports on the fate of sediment discharged from the Koglokoakyok River, and sedimentation rates and sediment transport in the port and harbour.</p>



	Information on plans to monitor potential bathymetric changes due to altered sedimentation and siltation.
--	---

IR Source:	NRCan
IR Number:	NRCan-IR 06
IR Directed to:	Proponent
Subject:	Volumes and types of dredged material
Reference:	Vol. 8 (sec. 21.3, 22.3, 23.3)
Issue/Concern:	The Proponent indicates that the seabed in the port and small craft harbour areas is composed of a wide variety of materials from bedrock to silt and mud (8-App21A-5.4; 8-App. 22A-5.2). The Proponent indicates that dredging and blasting will be conducted during construction (8-21.3.2.2) to create platforms for port and harbour infrastructure and gives the estimated area of disturbance (8-22-3.4.2), but gives no estimates of volumes of seabed sediment and bedrock involved. The amount of material determines the requirement for at-sea disposal, and the type determines how material can be disposed of or used.
Information Request:	NRCan recommends that the Proponent provide: Information and reports on the sediment distribution and thickness overlying the bedrock in the harbour and port, the desired design depths, and amounts of sediments and bedrock that will require disposal on land and at sea.

IR Source:	NRCan
IR Number:	NRCan-IR 07
IR Directed to:	Proponent
Subject:	Correction on activities regulated under the <i>Explosives Act</i>
Reference:	Vol. 1, MD.1.3 Regulatory Regime and Table MD1.1 Permits, Licenses, and Authorizations Required for the Grays Bay Road and Port Project (p. MD-5); Vol. 2 Table 3.4 (p. 9); Vol. 12, Section 3.7 Blasting and the Explosives Management Plan.
Issue/Concern:	Vol. 1 Section MD.1.3 states that the Proponent will require an NRCan licence for the storage, transport, and use of explosives; however, under the <i>Explosives Act</i> , NRCan regulates only the manufacturing and storage of explosives, not their transport or use, which is incorrectly described throughout the Impact Statement. Based on Vol. 1 Section MD.1.3, Vol. 2 (p. 2-31), Vol. 5 (Table 3.4, p. 9), and Vol. 11 Section 3.7 Blasting (p. 12), NRCan understands that a licence for storage and manufacturing will be required.
Information Request:	Revise the activity sought from NRCan for Explosives permit and licence to only include storage and manufacturing, removing transportation and use from all mentions of NRCan's licensing under the <i>Explosives Act</i> throughout the Impact Statement.

IR Source:	NRCan
IR Number:	NRCan-IR 08
IR Directed to:	Proponent
Subject:	Specify quantity and types of explosives to be manufactured and stored
Reference:	Section 8.2.11 Human Health and Safety of the Final Impact Statement Guidelines



Issue/Concern:	As per section 8.2.11 Human Health and Safety in the Final Impact Statement guidelines, “ <i>Assessment of the health, safety and security of workers at the job sites taking into account different proposed project phases and locations (e.g., explosive manufacturing plant, and operations, blasting operation, and heavy equipment operations)</i> ” (p. 88), NRCan requires additional information about the explosives components (e.g., types and quantities) to be stored on site in order to ensure the location of the explosives facility is safe, as per <i>Explosives Regulations, 2013</i> and guidelines.
Information Request:	Specify the quantity and type of explosives to be used, including the quantity of each type (e.g., number of ANFO and number of emulsion).

For information – no response needed.

IR Source:	NRCan
IR Number:	N/A
IR Directed to:	N/A
Subject:	Groundwater quantity aspects
Reference:	Vol. 6, 7, & 8
Issue/Concern:	<p>The groundwater assessments presented in Volumes 6–Terrestrial Environment and 7–Freshwater Environment provide a coherent and technically sound evaluation of potential project effects on Arctic hydrogeological systems. It is recognized that groundwater in the Local Assessment Area (LAA) is strongly controlled by permafrost and that impacts are expected to occur primarily through indirect pathways associated with land disturbance, hydrological modification, and permafrost degradation rather than through direct groundwater extraction or large-scale contamination.</p> <p>Groundwater quantity: The direct impacts on groundwater reserves are expected to be negligible since no groundwater abstraction is planned. Water demands during construction and operations will rely mainly on surface water withdrawals, which can generate only localized and reversible effects. Limited indirect impacts may occur through vegetation clearing, excavation, road construction, embankments, culverts, and borrow activities, all of which may potentially alter natural drainage patterns, recharge processes, and the connectivity between surface water and shallow groundwater. Potential changes to groundwater quantity are not assessed.</p> <p>Groundwater quality: Shallow groundwater is sensitive to similar pathways as surface water. Construction activities, such as excavation, blasting, soil disturbance, and in-stream work, may introduce suspended sediments, dissolved metals, hydrocarbons, and nitrogen compounds into shallow groundwater. The assessment also recognizes the potential for metal leaching and acid rock drainage from exposed rock and borrow materials. These pathways are well established in northern developments and reflect a sound understanding of hydrogeochemical risk. The expected impacts on groundwater quality will be localized, low in magnitude, and largely reversible with mitigation. Proposed mitigation measures include</p>



	engineered drainage systems, erosion and sediment controls, ML/ARD (metal leaching / acid rock drainage) management, progressive reclamation, and ongoing monitoring programs supported by adaptive management and Indigenous knowledge. These measures are consistent with best practices and should reduce most short-term risks if effectively implemented.
Comments:	The provided impact assessment offers a credible evaluation of impacts on groundwater quantity and quality and reasonably concludes that residual effects are likely to be minor and not significant within the spatial and temporal scope considered. The long-term uncertainties, however, remain regarding permafrost degradation, groundwater connectivity, and contaminant persistence. Continued monitoring and adaptive management is essential throughout the construction phase and the operations and maintenance phase. Information on plans for stability assessments to be conducted at approaches to water course crossings (especially major ones) to inform advanced design and development of mitigation plans. NRCan has no information request on this.

Transport Canada (TC)

IR Source:	TC
IR Number:	TC-IR 01
IR Directed to:	Proponent
Subject:	Missing information
Reference:	Volume 11, Appendix 37I – Port Management Plan, p. PDF 351
Issue/Concern:	The draft plan primarily provides a high-level framework and outline of the proposed marine, landside, aerodrome, operational, safety, and governance components associated with the Project. While the draft identifies the intended structure and operational scope of the Port Management Plan, many sections remain conceptual and rely heavily on “Note to Draft” placeholders rather than on detailed operational procedures and port management systems.
Information Request:	The proponent is requested to provide a comprehensive and operationally detailed Port Management Plan for review once the management systems are further developed.



IR Source:	TC
IR Number:	TC-IR 02
IR Directed to:	Proponent
Subject:	Oil pollution emergency plans
Reference:	Volume 10, Section 34.4.2 Marine Hazardous Materials Spill, p. 34-11
Issue/Concern:	"Large spills to the marine environment are considered unlikely to occur; however, the consequences of a large spill could be major and therefore the risk is considered high".
Information Request:	Transport Canada understands that the facility will carry an Oil Pollution Emergency Plan and that vessels calling at the port will also be required to have a Shipboard Oil Pollution Emergency Plan. However, the proponent is requested to confirm whether response arrangements and contingency plans have or will be developed for a large spill that exceeds the applicable thresholds set out in the Emergency Response Regulations (SOR/2019-252).

IR Source:	TC
IR Number:	TC-IR 03
IR Directed to:	Proponent
Subject:	Waste management
Reference:	Volume 8, Section 2.6.3.3 Grays Bay Port – Marine Infrastructure and Landside Infrastructure, p. 2-50
Issue/Concern:	"Operations and Maintenance activities that will be completed by WKR at the Grays Bay Port include, Waste management".
Information Request:	<p>The Arctic Shipping Safety and Pollution Prevention Regulations (ASSPPR) establish requirements applicable to vessels operating in the Canadian Arctic waters that include applicable provisions of the International Convention for the Prevention of Pollution from Ships (MARPOL), including requirements related to oily wastes, sewage, garbage, and other vessel-generated pollutants under the relevant MARPOL Annexes.</p> <p>The proponent is requested to confirm whether the Proponent will provide a dedicated waste management and waste reception facility at the port to support vessel operations. This includes facilities for safe reception, handling, and disposal of vessel-generated waste, such as oily waste, sewage (black and grey water), food waste, and garbage.</p>

IR Source:	TC
IR Number:	TC-IR 04
IR Directed to:	Proponent
Subject:	Marine navigation and shipping activities within Regional Assessment Area (RAA); Project Access Corridor Boundaries
Reference:	Volume 2, Section 2.6.1.1 Grays Bay Port – Marine-based and Landside Infrastructure, Table 2.8 Port Project Components, p. 2-28 Volume 8, Section 23, Table 23.18, p. 23-122 Volume 8, Section 23, Figure 23.10, p. 23-116
Issue/Concern:	Two deep-water berths are proposed to accommodate Post-Panamax Ore-Bulk-Oil ice class 1A vessels up to approximately 100,000 DWT with an approximate loaded draught of 15 m and length of 240 m. The proposed



	<p>vessel approach route to the port extends approximately 40 nautical miles south of the existing Northwest Passage shipping lane. Controlled marine access will be supported through marine communications systems and marine navigational aids located on the port headland, surrounding shoreline, and offshore islands.</p> <p>The spatial boundaries of the Project Access Corridor are not defined, except for the route as shown in Figure 23.10.</p>
<p>Information Request:</p>	<p>The Proponent should work with the Canadian Hydrographic Service to provide detailed hydrographic and bathymetric information for the approximately 40-nautical-mile vessel approach corridor to the proposed port, to demonstrate safe navigation and adequate under-keel clearance for the anticipated vessel classes and drafts.</p> <p>Based on the current review, the EIS does not clearly demonstrate that port approaches have been surveyed to modern standards, or that sufficient bathymetric coverage exists to support anticipated future marine traffic levels and deep-draft vessel operations. This is particularly important given that the EIS indicates the Project would improve marine safety and navigation in the region.</p> <p>In addition, the Proponent should engage with the Canadian Coast Guard regarding proposed aids to navigation associated with the Project.</p> <p>Given the above, the Proponent is requested to provide the following additional information regarding the Project Access Corridor and port approaches:</p> <ul style="list-style-type: none"> • definition of the Project Access Corridor, including its spatial boundaries (please provide a shapefile, if available); • hydrographic survey status and extent; • identified shoals, obstructions, and navigation hazards; • under-keel clearance analysis for expected vessel drafts; • contingency or alternate routing considerations; • information identifying preliminary/contingency safe anchorage zones within the RAA; and • whether dredging may be required to facilitate safe access to the port, including within the RAA. <p>The proposed project should be guided by Transport Canada's publication TP 15577E – Navigation Safety Assessment Process National Guidelines, which sets out the required framework for evaluating marine navigation safety risks associated with marine developments. TP15577E_0.pdf</p>

IR Source:	TC
IR Number:	TC-IR 05
IR Directed to:	Proponent
Subject:	Traditional Marine Navigation Routes within the Regional Assessment Area.
Reference:	Volume 3, Section 5.4.2 (reference to travel ways and marine use areas), p. 5-5



	Volume 9, Section 24 / VS.9.1 (TLMRU baseline and access to resources and areas), pp. VS.9-3 – VS.9-8
Issue/Concern:	<p>The Impact Statement acknowledges the existence of traditional Inuit travelways, including marine routes, and indicates that these are documented within the NTKP GIS database; however, it does not provide a clear, mapped, or sufficiently characterized baseline of Inuit marine navigation routes within the Project area.</p> <p>The Impact Statement recognizes that Inuit Knowledge includes mapped travelways, coastal use areas, and marine-related access routes, and that this information informed baseline conditions and spatial boundaries. However, the Impact Statement does not provide maps of traditional marine navigation routes, and there is no characterization of route use, seasonal patterns, or relative importance. Marine travel is addressed broadly under TLMRU, without identifying specific routes used by communities or demonstrating how these routes were validated or incorporated into marine infrastructure and vessel routing decisions. As a result, the baseline does not enable assessment of impacts to traditional marine access and use.</p>
Information Request:	The proponent is requested to provide a clear baseline description of traditional Inuit marine navigation within the Project area, including mapped travel routes, key access points, and high-use marine corridors. The EIS should include a description of route use (including seasonal patterns and importance), confirm how routes were identified and validated through Inuit Knowledge, and demonstrate how this information has been incorporated into Project design and marine transportation planning.

IR Source:	TC
IR Number:	TC-IR 06
IR Directed to:	Proponent
Subject:	Regulatory Requirements – <i>Canadian Navigable Waters Act</i>
Reference:	<p>Volume 2</p> <p>Section 1.4 Regulatory Regime, p. 1-9</p> <p>Table 1.2 Project Regulatory Requirements, p. 1-11</p> <p>Table 1.3 Permits, Licences, and Authorizations Required for the Grays Bay Road and Port Project, p. 1-12</p>
Issue/Concern:	<p>On p. 1-9, the EIS notes that approvals under the <i>Navigable Waters Protection Act</i> may be required for the Project. Further to this, Table 1.2 of the EIS refers to a Navigation Protection Act and Navigable Waters Approvals while Table 1.3 identifies the Project will require a <i>Navigable Waters Act</i> Approval.</p> <p>The <i>Navigable Waters Protection Act</i> and <i>Navigation Protection Act</i> were repealed in 2014 and 2019 respectively. The present applicable legislation that regulates works in, on, over, under, through or across any navigable water is the <i>Canadian Navigable Waters Act</i>, R.S.C., 1985, c. N-22, (CNWA), which came into effect in August 2019.</p> <p>The CNWA protects the public right of navigation on navigable waters above and beyond the requirements of the <i>Navigation Protection Act</i>.</p>



	By referencing repealed legislation, it is not clear the Proponent understands all the regulatory requirements that are applicable to the Project and how to assess the Project's potential impacts on navigation.
Information Request:	The proponent is requested to confirm that it understands that any Project work in, on, over, under, through or across any navigable water is regulated by the <i>Canadian Navigable Waters Act</i> , R.S.C., 1985, c. N-22.

IR Source:	TC
IR Number:	TC-IR 07
IR Directed to:	Proponent
Subject:	Regulatory Requirements – <i>Canadian Navigable Waters Act</i>
Reference:	Volume 8 Appendix 20A Fish and Fish Habitat Baseline Report <ul style="list-style-type: none"> Appendix A Desktop Assessment Data, Appendix A.1 Master Watercourse Table, Table A.1-1: Master Watercourse Table (PDF p. 1194)
Issue/Concern:	<p>Works, such as bridges and culverts, in, on, over, under, through or across any navigable water are regulated under the <i>Canadian Navigable Waters Act</i>, R.S.C., 1985, c. N-22, (CNWA). Works in non-navigable waters are not subject to the CNWA.</p> <p>The CNWA Minor Works Order and CNWA Major Works Order establish different regulatory requirements for different types of works. Minor works in a navigable waterway do not require an approval from Transport Canada. Major works require an approval from Transport Canada. There are also different regulatory requirements for works that are neither a minor nor a major work, depending on their location.</p> <p>Table A. 1-1: Master Watercourse Table lists a series of stream classes, e.g., ephemeral, and watercourse crossing types such as “minor crossing” and “major crossing”. However, Table A. 1-1 does not provide definitions or rationales for the listed stream classes or watercourse crossing types. There is no apparent correlation between Table A.1-1 and the CNWA.</p> <p>To assess impacts to the VEC of navigation and provide subsequent advice to the Board, Transport Canada requires information about the navigability of the waterways in the project area and whether a particular watercourse crossing is a minor work, major work, or non-minor or major work.</p>
Information Request:	<p>The proponent is requested to provide a table listing the Crossing ID with corresponding information about 1) whether the watercourse is navigable, 2) if navigable, whether the watercourse is a Scheduled Navigable Water, and 3) whether the watercourse crossing is a CNWA minor, major, or non-minor or major work.</p> <p>It is recommended the Proponent review information at https://tc.canada.ca/en/programs/apply-navigation-protection-program and https://tc.canada.ca/en/programs/navigation-protection-program/works-navigable-waters-canada and use Transport Canada's Navigation Protection Program <i>Project Review Tool</i> (https://npp-submissions-demands-opn.tc.canada.ca/projectreview-</p>



[outildexamenduprojet?GoCTemplateCulture=en-CA](#)) before completing the requested table.

Fisheries and Oceans Canada (DFO)

IR Source:	DFO
IR Number:	DFO-IR 01
IR Directed to:	West Kitikmeot Resources
Subject:	Baseline Studies – Temporal Natural Variability
Reference:	Volume 7, VS.7.1.1, VS.7.2.1 Volume 8, VS.8.2.1, VS.8.3.1 Volume 7, Appendix 20A Volume 8, Appendices 22A and 22B
Issue/Concern:	<p>The NIRB Impact Statement Guidelines (Sections 7.2.2 and 7.3) and federal impact assessment guidance (i.e., Impact Assessment Agency of Canada's Generic requirements for Impact Statements) require the Proponent to establish temporal boundaries to describe baseline conditions and account for natural variability over time. These requirements indicate that multiple years of data are needed for valued components that vary from year to year.</p> <p>In DFO's Assessing the Effectiveness of Habitat Offset Activities in Canada: Monitoring Design and Metrics (2015), the technical report states “the duration of monitoring must capture inter-annual variability or the monitoring program risks not being able to distinguish project effects from natural variability. One year of sampling is not adequate to provide any estimate of variability, two years of sampling are not adequate to generate a mean with valid error, therefore a minimum of three years of sampling are required, regardless of the type of data used (i.e., before data, historical data, benchmarks, control sites, etc.)” The report also explicitly states that monitoring should include “three years before development at the impact site to establish baseline”.</p> <p>However, for many valued components, the Proponent has completed only one round of baseline data collection during the Project-specific field studies. For a major project such as the Grays Bay Road and Port, with varied environmental impacts across a large spatial and temporal scale, the need for a robust baseline field study is high. The valued components in which only one round of baseline sampling was completed include:</p> <ul style="list-style-type: none"> - freshwater fish and fish habitat - marine fish and fish habitat - marine mammals <p>Many baseline programs for proposed projects undergoing an impact assessment incorporate 2-3 years of consecutive field studies in the impact statement. More specifically, this includes 2-3 repetitions of field data collection for each valued component in all impacted areas (i.e. a fish sampling program in a potentially impacted lake would be conducted at least twice, following the same timing and methodology for each repetition). This approach accounts for inter-annual variation in environmental</p>



	<p>conditions, mitigates biases and data gaps, and is a fundamental concept for scientific research.</p> <p>For Arctic and sub-Arctic ecosystems, the inter-annual variation for the aquatic environment can be further exacerbated due to high degree of variability in climate and hydrological variability, including sea ice conditions, water levels/flows, water quality, and freshet timing. The open-water season of 2025, for example, exhibited an unusually high amount of sea ice in the Coronation Gulf, caused by winds blowing sea ice into the gulf.</p>
Information Request:	<p>DFO requests the Proponent provide a rationale for the chosen sampling frequency during baseline studies (i.e., why 2-3 years of sampling not conducted) – considering the potential implications on freshwater and marine ecosystems of the proposed project, and the inter-annual variability in Arctic fish, marine mammals, and aquatic habitat – by providing the following:</p> <ul style="list-style-type: none"> - Evidence that the baseline dataset captures inter-annual and inter-seasonal variability - Description of potential biases introduced by the limited sampling - Description of how uncertainty has been incorporated into effects predictions <p>DFO also suggests revising or clarifying the use of the term “multi-year sampling” within the Impact Statement.</p> <p>Note - DFO expects a robust baseline report be included within a <i>Fisheries Act</i> Authorization (FAA) application in order for a Proponent to be issued an FAA.</p>

IR Source:	DFO
IR Number:	DFO-IR 02
IR Directed to:	West Kitikmeot Resources
Subject:	Underwater acoustics baseline methodology
Reference:	Volume 8, Section 23 and Appendix 23A Section 4.2.3.
Issue/Concern:	<p>The Proponent deployed one hydrophone from July 24 to August 23, 2025 near the proposed port location for measuring baseline underwater acoustic conditions. However, shipping is proposed to occur throughout open-water seasons (late June to October, a 3-4 month period), yet underwater acoustics baseline was only conducted for one month. DFO FFHPP has consulted with the DFO Science department and the subject matter experts (SMEs) on underwater noise and its impact to marine mammals. The SMEs support that a multi-year monitoring program is imperative for establishing baseline programs, and that a one-month deployment does not accurately capture the underwater soundscape nor the marine mammal presence (based on vocalizations) within a single open-water season.</p>
Information Request:	<p>Considering the proposed shipping timelines and the potential interaction with marine mammals and fish, both resident and migratory, please provide:</p>



	<ul style="list-style-type: none"> - a rationale for the duration of the underwater acoustics baseline sampling, - evidence that baseline dataset is sufficient to characterize underwater acoustics
--	--

IR Source:	DFO
IR Number:	DFO-IR 03
IR Directed to:	West Kitikmeot Resources
Subject:	Marine mammal survey timing
Reference:	Volume 8, Section 22, Page 23-16
Issue/Concern:	The aerial and vessel-based surveys for marine mammals (as part of the Project-specific field studies) were both completed in 2025 only. Furthermore, they were only completed in the month of August. This methodology and data set is extremely restrictive regarding the timing of surveys. Considering that many marine mammals are migratory, only passing through some areas within their range once annually (with some inter-annual variation). Therefore, restricting these surveys to only one month of one year heavily biases the data and alters the number of species/quantity of marine mammals possibly observed during baseline field studies.
Information Request:	Please provide a rationale on the timing methodology for marine mammal surveys during Project-specific field surveys.

IR Source:	DFO
IR Number:	DFO-IR 04
IR Directed to:	West Kitikmeot Resources
Subject:	2025 Baseline Sampling
Reference:	N/A
Issue/Concern:	The open-water season of 2025 exhibited an unusually high amount of sea ice in the Coronation Gulf, caused by winds blowing sea ice into the gulf. This overlaps with the only season in which the Proponent completed marine fish and marine mammal assessments in the LAA and RAA. However, this was not discussed in the Impact Statement, nor the potential biases in the baseline assessment caused by these irregular conditions.
Information Request:	Please include a description of the anomalous sea ice presence in the Coronation Gulf during the open-water season of 2025. Please describe any potential impacts upon the results of the baseline program, including any biases or data gaps.

IR Source:	Fisheries and Oceans Canada (DFO)
IR Number:	DFO-IR 05
IR Directed to:	West Kitikmeot Resources
Subject:	Timing Windows for Near-Water and In-Water Works (Marine)
Reference:	Volume 8, VS.8.4
Issue/Concern:	The document states the following: <ul style="list-style-type: none"> - Noise generating marine construction activities will be managed to minimize the potential for impacts (e.g., scheduling to avoid multiple noise sources and sensitive environmental periods, where



	<p>practicable, ramp-up or soft start techniques, silt/bubble curtains), and</p> <ul style="list-style-type: none"> - Blasting program will be designed to minimize potential effects to marine environment <p>Note – there are no restricted in-water activity periods produced by DFO for marine habitat, therefore additional considerations outside of DFO guidance would be needed for mitigating impacts to marine mammals and marine fish species from near-water blasting.</p> <p>In addition, engagement with Inuit communities resulted in a request that construction during migration seasons be avoided (Table 20.4, Section 20).</p>
Information Request:	<p>Elaborate on how the construction schedule will be optimized to avoid or minimize in-water and near-water works during sensitive periods for fish and marine mammals.</p> <p>Elaborate on which sensitive periods will be considered, the relevant species, and when these periods occur.</p> <p>Provide a construction schedule for marine works (table format) and a sensitive periods schedule for marine fish and marine mammals (table format).</p>

IR Source:	DFO
IR Number:	DFO-IR 06
IR Directed to:	West Kitikmeot Resources
Subject:	In-Water Works (Marine)
Reference:	Volume 8, Sections 22 and 23
Issue/Concern:	For in-water works in the marine environment (blasting, dredging, impact pile driving, drilling), there is no restricted activity period (RAP) established by DFO for Nunavut territory. In the absence of a defined RAP, it remains important for the Proponent to demonstrate how potential impacts to marine fish, anadromous fish, and marine mammals will be avoided or minimized through project-specific timing considerations and mitigation measures. The mitigation measures listed are high-level and do not provide enough detail to assess how in-water impacts will be avoided or minimized.
Information Request:	Please elaborate on the measures that will be implemented to avoid or mitigate harmful impacts to marine fish and marine mammals during in-water works. For example, describe whether exclusion zones for marine fish and marine mammals will be implemented, or whether fish salvaging be conducted prior to work in marine environments.

IR Source:	DFO
IR Number:	DFO-IR 07
IR Directed to:	West Kitikmeot Resources
Subject:	Species At Risk
Reference:	Volume 8, Sections 22 and 23
Issue/Concern:	Schedule 1 SARA-listed species are known or expected to occur within the RAA, potentially within the LAA, for both marine mammals and marine fish.



	No section in the Impact Statement specifically discusses the potential impacts to species at risk or their critical habitats.
Information Request:	The Proponent should include a section within the relevant volumes discussing SARA-listed species within the project area (PDA, LAA, or RAA), the potential impacts caused by project activities, the significance of those impacts, as well as the avoidance, mitigation, and monitoring measures planned to minimize these impacts.

IR Source:	DFO
IR Number:	DFO-IR 08
IR Directed to:	West Kitikmeot Resources
Subject:	Wolffish Presence in the LAA
Reference:	Volume 8, Section 22 Section 22.2.2.3 Table 22.7 and Page 22-41
Issue/Concern:	<p>Four species of wolffish (<i>Anarhichas spp.</i>) occur in Arctic waters, three of which are listed as threatened and special concern under Schedule 1 of SARA. The IS states that: “No wolffish have been captured or documented in Grays Bay during previous surveys (Wolfden 2006; Elliott and Cross 2013) or in 2025. Given their typical depth distribution, the fishing methods used in these surveys were unlikely to sample habitats where wolffish commonly occur. However, given catch records of wolffish in the area (Coad and Reist 2004; NCRI 2015; Bilous et al. 2022) and Inuit Knowledge of this species in the Coronation Gulf (Banci and Spicker, 2024) it is likely that wolffish species may be found within the RAA.”</p> <p>No comment was provided by the Proponent regarding wolffish in the LAA. Given their SARA status and likely regional presence, the Proponent must assess potential presence within the LAA.</p>
Information Request:	Please elaborate on the potential presence of each of the three SARA-listed wolffish species in the LAA, including whether the marine habitat in the LAA is suitable for these wolffish species.

IR Source:	DFO
IR Number:	DFO-IR 09
IR Directed to:	West Kitikmeot Resources
Subject:	Project Impacts on Wolffish
Reference:	Volume 8, Section 22, Page 22-41 Volume 8, Section 22, Page 22-42 Volume 8, Section 22, Page 22-142
Issue/Concern:	The Spotted Wolffish and Northern Wolffish are both listed under Schedule 1 of the <i>Species At Risk Act</i> as threatened. If no data is available to refute their presence in the LAA, a precautionary approach must be applied and the Proponent must consider these species and any potential critical habitats or residences. Since these Threatened wolffish species may occur in the area, it's important to understand how project activities could affect them and any critical habitats/residences.
Information Request:	Please provide an analysis on potential impacts from specific project activities to the Threatened wolffish, their residences, and critical habitats caused by project activities.



	Please elaborate on the significance of these impacts, both project-related and cumulative effects for both the LAA and RAA. Based on the sensitivities of this species to human activity, describe the potential magnitude of impact on this population. Finally, considering the impacts of climate change and other anthropogenic activity (induced or otherwise), describe the potential cumulative impacts on this species over the 75-years project lifespan.
--	---

IR Source:	DFO
IR Number:	DFO-IR 10
IR Directed to:	West Kitikmeot Resources
Subject:	Bowhead Whale Presence
Reference:	Volume 8, Section 23, Table 23.6 and Page 23-34
Issue/Concern:	Bowhead whale are believed to be uncommon but present within the RAA. The Bering-Chukchi-Beaufort population of bowhead whales is listed under Schedule 1 of the <i>Species At Risk Act</i> as a species of Special Concern. Because these SARA-listed marine mammals may occur in the area, it's important to understand how project activities could affect them.
Information Request:	<p>Please provide an analysis on potential impacts to SARA-listed bowhead whales caused by project activities. In particular, identify which project activities have the potential to impact this population.</p> <p>Please elaborate on the significance of these impacts, both project-related and cumulative effects for both the LAA and RAA. Based on the sensitivities of this species to human activity, describe the potential magnitude of impact on this population. Finally, considering the impacts of climate change and other anthropogenic activity (induced or otherwise), describe the potential cumulative impacts on this species over the 75-years project lifespan.</p>

IR Source:	DFO
IR Number:	DFO-IR 11
IR Directed to:	West Kitikmeot Resources
Subject:	Mitigations for SARA and Important Marine Mammal Areas
Reference:	Volume 8, Section 23, Table 23.18 Page 23-59
Issue/Concern:	<p>The listed <i>Mitigation, Management, and Enhancement Measures</i> listed for Species at Risk and Important Marine Mammal Areas are to “reduce speed to less than 7.0 kts when within 1,000 m (0.540 nautical miles (Nm)) (unless otherwise specified) of the nearest marine mammal to reduce vessel wake. Avoid abrupt course changes (NOTMAR 2025, A2-5)”.</p> <p>This mitigation also applies to reducing underwater noise and risk of vessel strikes, as noted later in the Impact Statement.</p> <p>It is unclear how this mitigation applies to SARA-listed species <u>and</u> species occurring within important marine mammal areas. Perhaps the mitigation should read as follows:</p> <ul style="list-style-type: none"> - If a Species at Risk is observed within 1000 meters of the vessel, reduce speeds to 7.0 knots; and



	- If an Important Marine Mammal Area is present within 1000 meters of the vessel, reduce speeds to 7.0 knots.
Information Request:	Please clarify how the speed reduction mitigation will be applied to interactions with SARA-listed species and Important Marine Mammal Areas. Please define Important Marine Mammal Areas, supported by the most recent Notice to Mariners (and other sources if applicable).

IR Source:	DFO
IR Number:	DFO-IR 12
IR Directed to:	West Kitikmeot Resources
Subject:	Vessel Speed Restrictions
Reference:	Volume 8, Section 23, Table 23.18 and Page 23-76
Issue/Concern:	<p>Speed restrictions are proposed for the Project Access Corridor, limiting speeds to a maximum of 10 knots in order to mitigate vessel strikes on marine mammals (as supported by Laird <i>et al.</i> 2001). There is no evidence provided on whether the proposed speed maximum is protective of the marine environment in terms of other impacts, including underwater noise, ice scour, propeller wash, and vessel wake.</p> <p>For larger vessels, a further speed reduction to 6 knots within the Project Access Corridor is proposed – no peer-reviewed research or technical papers have been referenced for this measure and its effectiveness mitigating impacts to marine mammals.</p> <p>For vessels transiting within the Northwest Passage but outside the Project Access Corridor, an approximate speed of 14 knots is proposed – no peer-reviewed research or technical papers have been referenced for this measure and its effectiveness mitigating impacts to marine mammals.</p>
Information Request:	<p>Where applicable, provide rationale for the proposed speed reductions (10 knots and 6 knots) and evidence that these are protective of marine mammals and marine fish by mitigating vessel strikes, ship wakes, propeller wash, shipping noise and ice scour.</p> <p>Also, provide a rationale on the proposed speed of 14 knots in the Northwest Passage outside of the Project Access Corridor, and its implications for impacts to marine mammals.</p> <p>Additionally, please provide comment on the Laird et al. (2001) paper, specifically whether the findings are supported by more recent peer-reviewed research or technical papers.</p>

IR Source:	DFO)
IR Number:	DFO-IR 13
IR Directed to:	West Kitikmeot Resources
Subject:	Project Access Corridor
Reference:	Volume 8, Section 23, Table 23.18 Volume 8, Section 23, Table 23.10



Issue/Concern:	Speed restrictions are proposed as a mitigation for multiple pathways of effect, including vessel wakes, propeller wash, and underwater noise. Speed restrictions are proposed as a maximum of 10 knots while traveling within the Project Access Corridor.
Information Request:	Please clarify whether all vessels transiting in and out of the port will be utilizing this Project Access Corridor, from large vessels to small craft.

IR Source:	DFO
IR Number:	DFO-IR 14
IR Directed to:	West Kitikmeot Resources
Subject:	Induced Vessel Traffic Projections
Reference:	Volume 8, Section 22, Table 22.18 Volume 8, Section 22, Page 23-111
Issue/Concern:	<p>Table 22.18 outlines the projected annual quantity and types of vessels expected at the Grays Bay port between 2035-2055. It also would be beneficial for DFO's review to understand the total transits expected annually associated with the port (both in-bound and out-bound traffic).</p> <p>Additionally, Table 22.18 of Volume 8 describes the maximum number of vessels calling into Grays Bay port (both project-related and reasonably foreseeable induced) as 45 vessels during the operations phase. Then on page 23-111, the total number of vessels during operations is stated as "an additional 45 transits annually in each direction (i.e., to and from the port)."</p>
Information Request:	Please clarify between number of vessels annually and number of transits annually throughout the Impact Statement. Please confirm these values represent the 'maximum use scenario' of the port – a commitment made by the Proponent during the NIRB Impact Statement Guidelines workshop in Cambridge Bay, NU, in December 2025.

IR Source:	DFO
IR Number:	DFO-IR 15
IR Directed to:	West Kitikmeot Resources
Subject:	Gaps in Vessel Traffic Projections
Reference:	Volume 8, Section 22, Table 22.18
Issue/Concern :	<p>The project is proposed to serve as multi-use infrastructure, available for use by industry, military, and the general public. The projections in Table 22.18 do not include annual vessel traffic from cruise ships (large vessels) communities (small craft), and other public traffic. Although this traffic may be comparatively low, the additional impacts caused by public use would contribute to the cumulative impacts over the project lifespan.</p> <p>In addition, it is unclear if emergency use of the port (such as unplanned berthing due to safety concerns/poor weather or spill response) are included in this cumulative impacts assessment.</p> <p>Additionally, it is unclear if commercial fishing vessels are expected to utilize the port throughout the Project lifespan, and whether this has been considered in the cumulative impacts assessment.</p>



	<p>Finally, it is unclear if this projection of vessel traffic includes the interaction from cumulative effects. For example, climate change is expected to reduce sea ice in the Arctic and extend the open-water shipping season. Therefore, the number of months per year vessels can transit in and out of the port could be extended, potentially increasing the number of vessels calling into port per year.</p>
Information Request:	<p>Please add projections of port utilization from commercial fishing vessels and the public (cruise ships, community use) into the table and subsequent analysis of cumulative impacts.</p> <p>Please clarify whether emergency use of the port has been included in the assessment.</p> <p>Clarify whether the interaction of all cumulative effects (including climate change) has been integrated into the vessel traffic projections.</p>

IR Source:	DFO
IR Number:	DFO-IR 16
IR Directed to:	West Kitikmeot Resources
Subject:	Underwater Noise Monitoring
Reference:	Volume 8, Section 22 and Section 23, Page 22-138 Volume 11, Section 3
Issue/Concern :	<p>Underwater noise monitoring (i.e., a hydroacoustic verification program) is proposed for noise-generating project activities (blasting and pile driving) to monitor for potential impacts to marine mammals and marine fish. However, the program description does not mention other noise generating activities like dredging and project-related shipping. While most noise-generating activities are planned to occur in the construction phase only, shipping is proposed to occur annually throughout operations (at least 75 years). Monitoring shipping noise impacts is important because shipping is known to generate broadband, continuous (non-impulsive) underwater noise which has repeatedly been demonstrated to impact behaviour of marine mammals and marine fish.</p> <p>Assumedly the hydroacoustic verification program would be a component of the Noise and Vibration Abatement Plan. Many details associated with the draft Noise and Vibration Abatement Plan have yet to be finalized, due to the need for further advancement in the construction design. However at this time, it would be beneficial for DFO's review for the Proponent to confirm which noise-generating activities with residual effects on freshwater and marine ecosystems will be addressed by the Noise and Vibration Abatement Plan - examples should include blasting, drilling, pile driving, dredging, infilling, and project-related shipping.</p>
Information Request:	<p>The Proponent should clarify whether a hydroacoustic verification program will be implemented for all noise-generating activities, and whether the program will include monitoring of underwater noise from vessels during both the construction and operations phases.</p> <p>Please confirm which Project activities will be addressed by the Noise and Vibration Abatement Plan.</p>



IR Source:	DFO
IR Number:	DFO-IR 17
IR Directed to:	West Kitikmeot Resources
Subject:	Marine Protected Areas In Relation to Shipping Routes
Reference:	Volume 8, Section 23, Page 23-28
Issue/Concern:	<p>The document states that “in the Canadian Arctic, there are three MPAs: Anguniaqvia niqiqyuam (Ung-u-niak-via Ni-kig-e-um), Tarium Niryutait, and Tuvaijuittuq (DFO 2024c). These MPAs are located outside of the RAA and, therefore, are not discussed further.”</p> <p>The proximity of shipping routes to MPAs is unclear as well as whether there are potential impacts from nearby shipping to MPAs through:</p> <ul style="list-style-type: none"> - Underwater noise generation - Ballast water discharge - Domestic waste discharge - Entry into MPAs by vessels, either accidentally or intentionally due to changes in safety conditions, creating an increased risk for <ul style="list-style-type: none"> o vessel strikes o vessel wake o propeller wash
Information Request:	<p>Clarify whether any analysis was conducted on the proximity of project-related or induced shipping routes to Arctic MPAs, and on the potential impacts associated with nearby vessel traffic.</p> <p>Provide further rationale on the omission of MPAs from the assessment of impacts to marine mammals and marine fish and fish habitat. If relevant, update the impact statement to include this assessment.</p>

IR Source:	DFO
IR Number:	DFO-IR 18
IR Directed to:	West Kitikmeot Resources
Subject:	Vessel Wake
Reference:	Volume 8, Section 22, Pages 22-64 and 22-75.
Issue/Concern:	<p>On Page 22-64, the document states “no permanent alteration or destruction of fish habitat as a result of construction vessel wakes or propeller wash are predicted”. Additionally on Page 22-75, “the infrequent nature of vessel activity, speed reductions in nearshore areas, and the placement of scour protection in the vessel berths are anticipated to limit sediment suspension as a result of vessel wake or wash, with no measurable impacts to fish habitat expected”.</p> <p>The information provided discusses potential effects of vessel wake on fish habitat and sediment suspension, but it does not directly address whether vessel wake is expected to impact shoreline stability within the LAA or RAA. Clarification is still required on shoreline stability effects.</p>
Information Request:	Provide information on whether vessel wake is expected to impact shoreline stability in the LAA and RAA.



IR Source:	DFO
IR Number:	DFO-IR 19
IR Directed to:	West Kitikmeot Resources
Subject:	Fuel Barge
Reference:	Volume 8, Section 22, Pages 23-51 and 23-61
Issue/Concern:	“Impacts to fish habitat are not anticipated if a terrestrial (on land) fuel storage option is selected. If a dedicated fuel barge is used, then a temporary (up to five years) loss of fish habitat is anticipated within the footprint of the barge ... approximately 3,600 m ² of subtidal habitat would be lost to marine mammals' use for the duration of the Construction phase (up to five years)”.
Information Request:	Please confirm if the footprint for the fuel barge is overlapping with the permanent infrastructure footprint – provide a rationale if not.

IR Source:	DFO
IR Number:	DFO-IR 20
IR Directed to:	West Kitikmeot Resources
Subject:	Ballast Water
Reference:	Volume 8, Table 21.10. Section 22, Page 22-49 Section 21, Page 21-51
Issue/Concern:	<p>Table 21.10 notes that vessel activity during operations may affect water quality via ballast water discharge. Page 22-49 states that ballast water is commonly required on larger vessels to maintain stability when not fully loaded with cargo. This water, often taken from one location and released in another, can carry deleterious substances (e.g., suspended solids, nutrients, hydrocarbons, metals) as well as invasive aquatic species and pathogens.” Page 21-51 also states “Ballast water discharge from construction and operational vessels poses a risk of introducing non-native species and pollution. Vessels arriving with cargo at the port site are not anticipated to discharge ballast water and will likely take on ballast water from the port area to compensate for cargo weight once offloaded”.</p> <p>It is unclear whether ballast water discharge will occur within the LAA or RAA, and potential areas of ballast water discharge are not identified. Additionally, to monitor and assess the effectiveness of planned mitigation measures regarding ballast water, it will be important to monitor in the correct location.</p>
Information Request:	<p>Please clarify whether ballast water is expected to be discharged to the Grays Bay LAA or RAA as a Project-related activity in any capacity. If relevant, provide the following information:</p> <ol style="list-style-type: none"> 1. Potential areas where vessels will empty their ballast water, as well as projections for discharge frequency, timing, and volumes; and 2. Plans for monitoring and managing the impacts of ballast water discharge (locations, parameters, frequency, reporting, contingency measures, etc.).

IR Source:	DFO
IR Number:	DFO-IR 21
IR Directed to:	West Kitikmeot Resources



Subject:	Riparian Vegetation Loss
Reference:	Volume 7, Section 20, Figure 20.4 Volume 8, Section 22, Page 22-68
Issue/Concern:	The section states that “Once built, the Project infrastructure is expected to result in a loss of approximately 20% of the existing riparian vegetation within the PDA.” It is unclear if this statement is in reference to only riparian vegetation adjacent to marine habitat at the port site, or if it includes the riparian vegetation at the road crossings (within freshwater habitat). In addition, Figure 20.4 <i>Change in Freshwater Fish Habitat from Project Activities in the Port LAA</i> shows total ‘riparian habitat clearing’ along the stream habitat associated with D2 and D6. The riparian habitat clearing displayed in this map shows extensive upstream and downstream clearing, the purpose of this clearing is unknown.
Information Request:	Please clarify whether the estimated 20% loss of riparian vegetation within the PDA includes riparian areas associated with freshwater habitat at road crossings, or if it applies solely to riparian vegetation adjacent to marine habitat at the port site. Please explain the rationale behind the extent of this riparian habitat clearing within the port LAA.

IR Source:	DFO
IR Number:	DFO-IR 22
IR Directed to:	West Kitikmeot Resources
Subject:	Changes in Behaviour of Marine Fish Caused by Changes in Water Quality
Reference:	Volume 8, Table 21.10. Section 22, Page 22-130
Issue/Concern:	Marine water quality may be affected during construction and the operation and maintenance phases (Table 21.10). The document states that “Cumulative effect pathways with the potential to change marine fish behaviour include the introduction of underwater noise generated by additional vessels transiting within the RAA during the Construction and Operations and Maintenance phases of the Project.” However, changes in marine fish behavior can also result from other pathways, including any changes in water quality (temperature, TSS, salinity) leading to avoidance behaviours in the PDA or LAA. It is unclear if this pathway was considered in the cumulative effect assessment.
Information Request:	Please clarify why only underwater noise was identified as a behavioural cumulative effects pathway for marine fish, and indicate whether changes in water quality (e.g., temperature, TSS, salinity) that may lead to avoidance behavior were considered in the cumulative effects assessment.

IR Source:	DFO
IR Number:	DFO-IR 23
IR Directed to:	West Kitikmeot Resources
Subject:	Anchorage
Reference:	Volume 8, Sections 22 and 23
Issue/Concern:	Alteration, disruption, and destruction of marine habitat caused by anchorages for medium and large-sized vessels is not discussed in



	Sections 22 or 23. Designating anchorage sites is important for mitigating the spatial extent of marine habitat impacts caused by anchoring.
Information Request:	<p>Please clarify whether designated anchorage sites will be established within the LAA.</p> <p>If this is the intent, please provide the locations (shapefiles) of these anchorages. An assessment of effects on marine mammals and marine fish and fish habitat would also be required. If designated anchorages are not intended, please provide a rationale.</p>

IR Source:	DFO
IR Number:	DFO-IR 24
IR Directed to:	West Kitikmeot Resources
Subject:	Marine Fish Habitat
Reference:	Volume 8, Section 22, Page 22-56
Issue/Concern:	<p>Page 22-56 of the document describes the results of the subtidal habitat and remote sensing surveys, including substrate types and depths. Section 22.2.2.2 Marine Fish Habitat describes the baseline characteristics of the marine fish habitat. However, the section lacked a description of the substrate composition in terms of fish habitat functions, including an assessment of the habitat suitability for spawning or rearing of relevant marine or anadromous fish.</p> <p>A description of substrate type and habitat suitability are necessary for evaluating potential project effects on fish and fish habitat.</p>
Information Request:	Please provide a description of substrate composition with an assessment of the habitat suitability for spawning and rearing of relevant marine and anadromous fish species.

IR Source:	DFO
IR Number:	DFO-IR 25
IR Directed to:	West Kitikmeot Resources
Subject:	Vessel Strikes
Reference:	Volume 8, Section 23, Page 23-87
Issue/Concern:	<p>The document states “direct physical contact between Project equipment and marine mammals may result in harm to individuals directly affected. Seals are the marine mammal most likely to be affected by direct contact risks due to their presence in the area. However, all marine mammals have a high degree of mobility and are therefore at low risk of injury or mortality from this pathway.” In summary, it characterizes vessel-strike risk as low on the basis that marine mammals have a high degree of mobility.</p> <p>This assessment does not incorporate the variability in mobility and swim speeds of different marine mammals in the RAA, nor does it account for the responses of different marine mammals to underwater noise – for example, some species are known to react to vessel noise with a ‘freeze’ response. Others are known to be highly resilient to vessel noise and become easily habituated to anthropogenic activities.</p>
Information Request:	Please elaborate on the risk of injury or death of marine mammals by vessel strikes, incorporating current scientific knowledge on the varied marine mammal behaviour and response in the Arctic (for pinniped and



	cetacean species occurring in the RAA). Provide a rationale supported by peer-reviewed references.
--	--

IR Source:	DFO
IR Number:	DFO-IR 26
IR Directed to:	West Kitikmeot Resources
Subject:	Cumulative Impacts on Marine Mammal Sensory Disturbance
Reference:	Volume 8, Section 23, Page 23-120
Issue/Concern:	<p>The following sentence describing the duration of behavioural disturbance is difficult to interpret: “Based on the strong understanding of potential effects pathways, the anticipated effectiveness of mitigation measures, and the assessment of cumulative effects any change in behaviour caused by sensory disturbance is anticipated to be transitory and relatively brief in duration, lasting less than three hours of the open-water season per year on the shipping route for seals and 198 and 163 hours per year of the open-water season for whales (i.e., bowhead and beluga and narwhal, respectively).”</p> <p>The meaning of these hour-based estimates is unclear, and the values differ from the numbers stated on page 23-112 (an individual bowhead whale or beluga/narwhal may experience a maximum of 207 and 171 hours per year above the behavioural disturbance threshold). Additional explanation is required to understand the duration of behavioural disturbance.</p>
Information Request:	Please further explain this sentence - particularly the estimates of hours of open-water season for different species.

IR Source:	DFO
IR Number:	DFO-IR 27
IR Directed to:	West Kitikmeot Resources
Subject:	Cumulative Impacts on Marine Mammal Sensory Disturbance
Reference:	Volume 8, Section 23, Page 23-120
Issue/Concern:	<p>The following sentence mentions mitigation measures for addressing cumulative impacts from underwater noise but does not describe the nature of the mitigation measures: “Based on the strong understanding of potential effects pathways, the anticipated effectiveness of mitigation measures, and the assessment of cumulative effects any change in behaviour caused by sensory disturbance is anticipated to be transitory and relatively brief in duration ...”.</p>
Information Request:	Please describe which mitigation measures are to be implemented to address underwater noise cumulative impacts , to reduce the significance to low or negligible in magnitude.

IR Source:	DFO
IR Number:	DFO-IR 28
IR Directed to:	West Kitikmeot Resources
Subject:	MMO Programs for Project Vessels
Reference:	Volume 8, Section 23.7



Issue/Concern:	<p>DFO expects the Proponents to implement a marine mammal observer (MMO) protocol, as an appendix to the Wildlife management and Monitoring Plan. The MMO protocol would be implemented throughout each project-related vessel transit within the Arctic region, and also during in-water and near-water marine activities such as blasting, pile driving, infilling, and dredging. MMOs monitor for marine mammals, record observations, and communicate with the vessel crew in order to implement adaptive measures when needed. The adaptive measures (speed reduction, vessel redirection) are intended to mitigate disturbance and avoid incidents. (These protocols are often designed by the Proponent and implemented onto project-related vessels and during noise-inducing activities, with the Proponent also responsible for collecting results, providing annual reporting, and updating the MMO protocol on a routine basis. MMO protocols must be developed and updated with input from DFO, communities, and other interested parties.</p> <p>Note – DFO has published guidance on the recommended training, education, and experience requirements for MMO staff (Recommended standard qualifications for marine mammal observers and passive acoustic monitoring operators : ba guidance document for offshore geophysical surveys in Canada).</p>
Information Request:	<p>Please clarify whether the Proponent intends to implement a MMO protocol for project-related vessel transits, and also during activities such as blasting, pile driving, infilling, and dredging. Please elaborate on what the MMO would entail (monitoring methods, contingency measures, and reporting process) and how it will be developed. If the Proponent does not intend to develop a MMO protocol, please explain why.</p>

IR Source:	DFO
IR Number:	DFO-IR 29
IR Directed to:	West Kitikmeot Resources
Subject:	Marine Mammal Observer (MMO) Programs
Reference:	Volume 8, Section 23 Volume 11, Section 8
Issue/Concern:	<p>The document states “effectiveness monitoring of marine mammals before, during, and after passage of vessels. The program could involve both visual and acoustic, or other monitoring techniques.”</p> <p>It is unclear what effectiveness monitoring of marine mammals entails, including how vessel passage is defined in this context and whether monitoring is intended to assess marine mammal presence and behaviour within the LAA, the RAA, or across the entire transit.</p> <p>The Marine Mammal Management and Monitoring Plan within the draft <i>Wildlife Monitoring and Mitigation Plan</i> did not provide any more detail or clarity to these points.</p>
Information Request:	<p>Please describe the scope of this monitoring program. Clarify what constitutes a passage of vessel for monitoring purposes, and specify whether monitoring is intended within the LAA, the RAA, or across the full vessel transit route. Clarify what the effectiveness monitoring of marine</p>



	mammals entails. Indicate whether this program is intended to operate as a MMO program for shipping. This should be addressed in the Marine Mammal Management and Monitoring Plan as well.
--	--

IR Source:	DFO
IR Number:	DFO-IR 30
IR Directed to:	West Kitikmeot Resources
Subject:	Aquatic Invasive Species
Reference:	Volume 7, Section 20 Volume 8, Section 23
Issue/Concern:	No description of the presence of aquatic invasive species (AIS) was completed for the baseline condition in the marine habitat and freshwater. It is unclear if the Proponent completed an analysis of AIS presence within the Project LAA or RAA. Establishing baseline conditions including the presence or absence of aquatic invasive species is necessary to understand any potential project-related introduction.
Information Request:	Please clarify whether an assessment of AIS presence in the LAA and RAA was completed for marine and freshwater environment. If so, provide baseline condition of AIS presence. If no AIS assessment was conducted, please explain why.

IR Source:	DFO
IR Number:	DFO-IR 31
IR Directed to:	West Kitikmeot Resources
Subject:	Fish and Fish Habitat Offsetting
Reference:	Volume 8, Section 22 and Section 23, Page 22-138
Issue/Concern:	Offsetting monitoring is mentioned in the Follow-Up and Monitoring section but potential offsetting concepts are not included. DFO expects an offsetting plan to be included in the Proponent's future application for a <i>Fisheries Act</i> Authorization. Offsetting plans require consultation with impacted communities. DFO strongly suggests doing so through the Impact Assessment to avoid additional consultation.
Information Request:	Describe any preliminary concepts that have been evaluated for offsetting measures. If none have been identified, describe how the Proponent intends to engage with DFO and communities to develop offsetting measures.

IR Source:	DFO
IR Number:	DFO-IR 32
IR Directed to:	West Kitikmeot Resources
Subject:	Shapefiles
Reference:	N/A
Issue/Concern:	DFO received a shapefile for the proposed project development area (PDA), encompassing the port, port facilities, aerodrome, road route, and



	Jericho Station. Updated and additional geospatial information on proposed infrastructure would be very useful for our review (for culverts, bridges, and quarries along the all-season road, water withdrawal locations throughout the PDA, winter road route from Jericho Station to the Tibbit-to-Contwoyto Winter Road, frozen-in fuel barge, large vessel wharves, barge landing area, small craft harbour, concentrate storage area at Grays Bay, etc.). For freshwater watercourses overlapping with the PDA, a confirmation of presence or absence of fish in the geospatial data would also be beneficial for DFO's review.
Information Request:	Please provide a shapefile for these locations and include a fish species list for each waterbody and watercourse directly impacted by the project.

IR Source:	DFO
IR Number:	DFO-IR 33
IR Directed to:	West Kitikmeot Resources
Subject:	Permafrost Degradation Impacts
Reference:	Volume 7, Section 20, Pages 20-1 and 20-57
Issue/Concern:	<p>Thawing of permafrost was not included as a pathway of effect in the <i>Assessment of Potential Effects on Freshwater Fish and Fish Habitat</i>. Permafrost thaw can lead to fish passage issues by impacting infrastructure integrity, causing slumping of road embankments, altering channel alignment or grade, increasing sedimentation, creating perched culverts, and altering hydrology. Therefore, permafrost can impact fish and fish habitat through loss of habitat, barriers to migration, and death of fish.</p> <p>For example, the Inuvik-to-Tuktoyaktuk Highway has developed perched culverts due to lack of embedment and permafrost movement, which leads to impeded fish passage. Permafrost degradation also leads to slumping of sediments and road material, leading to alteration and loss of fish habitat.</p> <p>In addition, the document notes that quarry operations will be ongoing throughout the construction and operations phases of the Project. A setback distance of 31 meters between quarries and waterbodies or watercourses is proposed. No discussion on the impacts of quarrying activities interacting with permafrost is included.</p> <p>The potential impacts of permafrost degradation on fish and fish habitat were not described in the Impact Statement.</p>
Information Request:	<p>Please describe the potential impacts of permafrost degradation on fish and fish habitat. Please include the following:</p> <ul style="list-style-type: none"> - baseline data on permafrost at all proposed watercourse crossing locations - mitigation measures designed to prevent thawing of permafrost - plans for monitoring permafrost and culvert structural integrity - responses and contingency measures if permafrost thawing is observed at water crossing locations



	Provide information on whether quarry proximity to fish-bearing watercourses may impact permafrost at culvert locations and impact culvert integrity.
--	---

IR Source:	DFO
IR Number:	DFO-IR 34
IR Directed to:	West Kitikmeot Resources
Subject:	Culvert Inspections and Response
Reference:	Volume 7, Section 20, Page 20-60
Issue/Concern:	The document states "Routine inspection of watercourse crossings will be conducted to determine if they are functioning as per design (e.g., allow fish passage) and identify potential evidence of erosion and sedimentation. If a barrier to fish passage or erosion and sedimentation issues are observed, corrective actions will be implemented."
Information Request:	<p>Please provide details on the routine inspections (frequency, timing, data collection) and examples of corrective actions that would be undertaken if, for example, barriers to fish migration or indications of failing mitigation measures are observed during the routine inspections.</p> <p>Additionally, would watercourse crossing monitoring include an 'as-built' inspection post-construction to ensure all crossings are built as designed?</p>

IR Source:	DFO
IR Number:	DFO-IR 35
IR Directed to:	West Kitikmeot Resources
Subject:	Culvert Crossings Number
Reference:	Volume 7, Section 20, Page 20-41
Issue/Concern:	<p>A total of 171 watercourse crossings have been proposed for the Project. It is unclear if culverts will be used during the construction phase for temporary access roads, and if their number has been included in this calculation.</p> <p>The document also states "it is anticipated that there will be 18 major crossings (i.e., greater than a 5 m structural span), which will include single or multi-span bridges ... 40 to 50 watercourse crossings will require bridge-sized closed or open-bottom culverts between 1.5 to 5 m diameter."</p> <p>Culverts, even if initially installed properly, are more at risk of degrading and causing fish passage issues. An important factor in choosing between bridge or culvert installation is the ecological importance of the habitat, as well as the potential upstream and downstream impacts. The impacts upon fish migration, spawning, and rearing within the watercourse and connected waters should all be considered. Additionally, the potential impacts upon local hydrology should also be considered.</p>
Information Request:	<p>Confirm that the total number of watercourse crossings includes those potentially needed for temporary access roads during the construction phase.</p> <p>Additionally, please provide the rationale for selecting 5 m as the threshold between major crossings and culvert installations. Please elaborate on</p>



	whether and how ecological importance of the watercourses were considered for the selection of the watercourse crossings to be installed.
--	---

IR Source:	DFO
IR Number:	DFO-IR 36
IR Directed to:	West Kitikmeot Resources
Subject:	Anadromous Fish and Marine Works
Reference:	Volume 7, Section 20, Page 20-38 Volume 8, Appendix 22A, Table 5.2
Issue/Concern:	<p>The document states that “activities occurring in the marine environment will not interact with freshwater fish or fish habitat” including construction of marine infrastructure, port operations, and desalinations operations.</p> <p>However there are anadromous and semi-anadromous fish species, such as Arctic Char and Lake Trout, which migrate from freshwater into marine ecosystems both annually or inter-annually. These species would potentially be exposed to project-related marine impacts during their marine life stages.</p> <p>It is unclear if the impacts on anadromous and semi-anadromous fish were specifically assessed.</p>
Information Request:	<p>Provide a rationale for the statement on marine activities interacting with freshwater fish and fish habitat.</p> <p>If appropriate, please elaborate on how anadromous fishes, which occupy both freshwater and marine ecosystems, are impacted by marine works.</p>

IR Source:	DFO
IR Number:	DFO-IR 37
IR Directed to:	West Kitikmeot Resources
Subject:	Winter Spawning Species
Reference:	Volume 7, Section 20, Page 20-60
Issue/Concern:	<p>The document states that in order to mitigate impacts to the freshwater environment, the Proponent will conduct in-water construction activities outside of the restricted activity timing windows for the protection of fish and fish habitat in Nunavut. The restricted windows for spring and fall spawning species are listed. Winter spawning species (i.e. burbot) are not included. The listed mitigations also includes that watercourse crossing construction will be primarily done during the winter - due to watercourses likely being frozen to the bottom therefore eliminating fish presence.</p> <p>It is unclear if overwintering assessments were completed to confirm winter construction would not impact winter-spawning fish or overwintering fish.</p>
Information Request:	<p>Please elaborate on whether overwintering assessments were completed to confirm winter construction would not impact winter-spawning fish or overwintering fish. If these assessments were completed, please provide them.</p>

IR Source:	DFO
-------------------	-----



IR Number:	DFO-IR 38
IR Directed to:	West Kitikmeot Resources
Subject:	Fish Passage
Reference:	Volume 7, Section 20, Page 20-51
Issue/Concern:	<p>The document states that alteration of fish passage is not anticipated to result from the construction of the Project.</p> <p>For the purpose of the IS, the residual effects of alterations to fish passage need to be described in terms of magnitude, timing, duration, frequency. Also, it is unclear whether in-water causeways will be required for the construction of water crossings associated with the Project (particularly the major crossings). If required, it is unclear if temporary causeways would remain in place during sensitive periods for freshwater fish (i.e. spring/fall migration or spawning seasons).</p>
Information Request:	<p>Like the other potential effects to freshwater fish and fish habitat, the Proponent should address fish passage with a description of the magnitude, duration, spatial scale, regularity, sensitive timing, and reversibility.</p> <p>Please confirm whether in-water causeways would be required for watercourse crossing construction.</p>

IR Source:	DFO
IR Number:	DFO-IR 39
IR Directed to:	West Kitikmeot Resources
Subject:	Cumulative and Transboundary Impacts – Freshwater Fish and Fish Habitat
Reference:	Volume 7, Section 20, Page 20-74 Volume 10, Section 33.3, Page 33-11
Issue/Concern:	<p>The Proponent states that reasonably foreseeable physical activities – such as from the Jericho Mine, Grays Bay Road and Port: Airstrip Expansion, High Lake, Grays Bay Road Phase 2 – Jericho Mine to NT Border, Hackett and Back River Access Road, Izok Lake Mine (Izok Corridor Project), and Izok Lake Access Road – will not contribute to effects on fish habitat within the freshwater fish and fish habitat RAA.</p> <p>However, the Proponent states that there will be residual impacts from the Project upon fish and fish habitat, as summarized in Table 20.13. The Proponent further explains that the reasonably future physical activities within the RAA will likely have similar types of impacts to fish and fish habitat, but will have to undergo their own processes territorial/federal approvals, permitting, and/or environmental impact assessments. Therefore, it is reasonable to assume those projects will also result in residual impacts to freshwater fish and fish habitat, which would contribute to the cumulative impacts within the RAA.</p> <p>Additionally, the biophysical VCs with the potential to experience transboundary effects did not include freshwater fish and fish habitat. The document states “project residual effects on freshwater fish and fish habitat are limited to the LAA (Section 20). The LAA, which is located within the NSA, is defined by a 100m buffer around the PDA plus an extension to the</p>



	<p>northwest side of the Kennarctic River west of the Aerodrome. Consequently, no effects are predicted outside the NSA and as such, no transboundary effects.”</p> <p>However, due to the interconnectivity of watercourses/waterbodies within watersheds, and the proximity of project infrastructure to the NWT/NU border, there is a potential for transboundary effects to impact freshwater fish and fish habitat.</p> <p>As discussed earlier, the omission of residual effects extending into the freshwater fish and fish habitat of the RAA is questionable. Therefore, the residual effects on freshwater fish and fish habitat determined in Volume 7, Section 20 – particularly those occurring near the NWT/NU border – may extend into the Northwest Territories through cross-border habitat connectivity.</p>
Information Request:	<p>Please provide a rationale for the conclusion that reasonably foreseeable physical activities will not contribute to effects on fish habitat within the freshwater fish and fish habitat RAA, and revise if necessary.</p> <p>Please provide a rationale for the exclusion of freshwater fish and fish habitat from the listed VCs with the potential to experience transboundary effects.</p>

IR Source:	DFO
IR Number:	DFO-IR 40
IR Directed to:	West Kitikmeot Resources
Subject:	Mackenzie Valley Transboundary Impacts
Reference:	Volume 8, Section 22 and Section 23
Issue/Concern:	<p>Previous engagement on the Project has identified barging operations anticipated to potentially occur from Tuktoyaktuk, Inuvik, or Hay River to the Project port site. Therefore, transboundary impacts will likely extend into both the Inuvialuit Settlement Region and the Mackenzie Valley, potentially impacting valued components relevant to the DFO mandate, including:</p> <ol style="list-style-type: none"> Marine fish and fish habitat Marine mammals Freshwater fish and fish habitat <p>Based on DFO’s current review, transboundary impacts to marine and freshwater fish and fish habitat were not included in the document.</p>
Information Request:	<p>Please provide a rationale for omitting freshwater fish and fish habitat from the transboundary impacts, considering the potential barging activities in Hay River (Mackenzie Valley). Please include distinct sections in the Transboundary Effects Assessment summarizing the transboundary impacts to the Inuvialuit Settlement Region <u>and</u> the Mackenzie Valley.</p> <p>Please reference and address the results of the Mackenzie Valley Review Board’s <i>Supplemental Transboundary Scoping Report</i>.</p>

IR Source:	DFO
-------------------	-----



IR Number:	DFO-IR 41
IR Directed to:	West Kitikmeot Resources
Subject:	Transboundary Impacts – Marine Mammals
Reference:	Volume 10, Section 33.3, Page 33-22
Issue/Concern:	<p>The document states “any transboundary disturbance to marine mammals from underwater noise associated with vessel activity outside the RAA would be transitory and only occur within the open water season. Given the estimated source levels and infrequency of traffic, the disturbance is anticipated to be minor and relatively brief in duration, even with the variance in marine mammal species densities and distribution outside of the RAA.”</p> <p>It is not evident why it was concluded disturbances are anticipated to be minor and whether the Proponent based this conclusion on lessons learned from comparable projects, including observed underwater noise impacts on marine mammals at Baffinland. Experience from other Arctic projects shows how underwater noise can affect marine mammals and using that information helps ensure the assessment is realistic and up to date.</p>
Information Request:	Please provide a rationale for the significance determination of underwater noise transboundary effects upon marine mammals. Confirm whether the Proponent based this conclusion on lessons learned from comparable projects.

IR Source:	DFO
IR Number:	DFO-IR 42
IR Directed to:	West Kitikmeot Resources
Subject:	Wildlife Monitoring and Mitigation Plan – Monitoring Metrics
Reference:	Volume 11, Section 8, Page 21
Issue/Concern:	<p>The proposed primary monitoring metrics for marine mammals in the draft Wildlife Monitoring and Mitigation Plan (WMMP) are:</p> <ul style="list-style-type: none"> - Species occurrence and distribution within the RAA - Vessel strikes with marine mammals <p>Behavioural observations of marine mammals (as well as other wildlife) is an important metric for the impacts of Project activities, and predicting the potential long-term trends of impacts on marine mammals throughout the Project lifespan.</p>
Information Request:	Please provide a rationale on excluding behavioural observations from the primary monitoring metrics of the WMMP regarding marine mammals. Revise metrics if applicable.

IR Source:	DFO
IR Number:	DFO-IR 43
IR Directed to:	West Kitikmeot Resources
Subject:	Wildlife Monitoring and Mitigation Plan – Marine Mammal Management and Monitoring Plan
Reference:	Volume 11, Section 8, Page 31



Issue/Concern:	<p>The Marine Mammal Management and Monitoring Plan section outlines the applicable guidance for avoiding and mitigating impacts to marine mammals. Some additional relevant guidance is as follows:</p> <ul style="list-style-type: none"> - National Marine Fisheries Service's (NMFS) <i>Summary of Recommended Marine Mammal Protection Act Acoustic Thresholds</i> - DFO's <i>Recommended Standard Qualifications for Marine Mammal Observers and Passive Acoustic Monitoring Operators: A Guidance Document for Offshore Geophysical Surveys in Canada</i>
Information Request:	Please update the list of applicable guidance to include these documents, if applicable.