



**July 3, 2026**

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

**Subject: Caribou Guardians Coalition Information Request Submission for the Grays Bay Road and Port Project, NIRB Project 125987/24XN038**

The Caribou Guardians Coalition (CGC) has reviewed the Impact Statement submitted by West Kitikmeot Resources Corp. for the proposed Grays Bay Road and Port Project. CGC has identified a number of areas requiring additional information to enable a complete and informed review of the Project.

The Coalition believes as development advances in the North, barren ground caribou must be a central value in the decision making and design of northern progress. Caribou are a keystone species and for Indigenous peoples in northern Canada, caribou are everything to us.

As such, it's just as important to create opportunity for indigenous representation and knowledge to be a part of future progress and that the voices of indigenous experts and knowledge keepers not just advise on such progress but help keep development accountable to the well-being of caribou. Guardians are equally important, and Indigenous led initiatives to monitor development and protect caribou must be a part of the equation

The Information Requests identified in the attached table below seek additional information and clarification regarding the assumptions, methodologies, and conclusions with respect to Indigenous Knowledge presented in the Impact Statement. The requests are intended to support a thorough technical review of the Project to ensure that potential impacts on Caribou and the relationship Indigenous peoples have with Caribou is adequately understood and considered as Project moves forward.

Sincerely,

A handwritten signature in black ink that reads "Amos Scott".

Amos Scott  
Executive Director, Caribou Guardians Coalition  
executivedirector@caribougardianscoalition.ca



IR #	IR Directed To	Subject	Reference	Issue/Concern	IR Request	Comments
IR #1	WKR/NIRB	Project-specific Inuit Knowledge Report <i>Kitikmiut Knowledge of the Proposed Koglokoakyok (Grays Bay) Port and Road Project</i> (Banci and Spicker 2024)	All Volumes	WKR states that the IS was guided by a single, project specific Inuit Knowledge report sourced from the KIA's NTKP database. As this document was not appended to the IS due to licensing restrictions, it is unclear how much Inuit Knowledge from the NTKP was responsible for shaping the identification, assessment and evaluation of VCs. Additionally, there is not the opportunity to evaluate whether the knowledge referenced from this report in IS Volumes is Project specific, or regionally relevant. Nor is there an opportunity to identify potential Knowledge gaps in relation to existing Inuit and Indigenous Knowledge studies that were conducted for previous projects relevant to RAA.	We ask the NIRB to request review of this report under confidential cover to evaluate whether the Inuit Knowledge referenced throughout the IS represents knowledge present in the report. Currently there is no ability to evaluate how Inuit Knowledge was selected from NTKP, how the knowledge was applied to the assessment, and whether it has adequately been incorporated into the evaluation of Project design, potential impacts, significance determinations, mitigation measures and conclusions.	
IR #2	WKR	Guardians, Caribou and Caribou People, Cultural Identity	Volume 1 Section 1.6.3; Volume 9	The IS does not explain how direct and indirect impacts to the relationship between caribou and Caribou People will be monitored and addressed over the long-term.	Please respond to the following: 1) Please provide details around how Inuit and Indigenous harvesting areas, travel routes, cabins, camps and culturally important caribou areas were identified and incorporated into the assessment;	



IR #	IR Directed To	Subject	Reference	Issue/Concern	IR Request	Comments
					2) Please explain the methods used to assess impacts to caribou in terms of the relationship between caribou and Caribou People	
					3) Please explain the methods used to assess impacts to intergenerational transfer of Indigenous knowledge around caribou;	
					4) Please detail which guardians programs will be in place to care for the relationship between caribou and Caribou People	
					5) Please explain what role that CGC and Indigenous peoples will have in guardians program and collaborative adaptive management.	
IR #3	WKR	Incorporation of Inuit, Indigenous and Community Knowledge in Road Design	Volume 2 Section 2.1.1	Citations used for road design focus on western science, without clearly drawing from Indigenous, Inuit and Community Knowledge.	Please provide evidence that Inuit and Indigenous and Community Knowledge support a 3H:1V slope design for road construction in relation to caribou and wildlife crossing.	
IR #4	WKR	Project design considerations specific to caribou	Volume 2 2.1.1	WRK state that baseline studies and caribou monitoring along the road will determine areas that have the highest crossing potential. It is not clear whether Inuit, Indigenous and Community Knowledge has been incorporated into the methodology	Please detail how Inuit, Indigenous and Community Knowledge will be incorporated into the identification and design for caribou and wildlife crossing locations.	



IR #	IR Directed To	Subject	Reference	Issue/Concern	IR Request	Comments
				for identifying areas suitable for caribou and wildlife crossings.		
IR #5	WKR	Primary Indigenous Knowledge Contribution Opportunities for non-Kitikmiut Rights Holders	Volume 3, Section 4.2; Executive Summary ES-14; Volume 10	Only Kitikmiut knowledge was gathered as primary, verified, owned knowledge through a dedicated process. The IS states no similar agreements were set up with other Indigenous groups who exercise section 35 rights within the RAA. Indigenous Knowledge from these communities is referenced from publicly available literature and public engagement records. Those are among the people whose harvest of the Bathurst herd is most affected.	Please confirm whether Tłı̨chǫ Government, Yellowknives Dene First Nation, North Slave Métis, NWT Métis, Athabasca Denesų́nė Né Land Corporation were offered the same dedicated, consent-based, owned knowledge process that Kitikmiut Inuit were. If not, explain why, and explain how their knowledge was gathered and weighted to the same standard.	
IR #6	WKR	Methods of Engagement	Volume 3 Section 6.2, 6.3	WKR identifies that engagement methods with Inuit, Indigenous and Community groups were selected based on the intended audience and purpose of each session, but it is not clear whether these activities were eliciting Indigenous Knowledge or public feedback.	Please detail which recorded engagement activities and methods were specific to Indigenous and Community Knowledge collection, versus general public engagement for the Project.	
IR #7	WKR	Sources Consulted for Inuit, Indigenous	Volume 3 Section 8; Volume 6 Section	The Inuit and Indigenous Knowledge consulted for Volumes 3, 6 and 9 does not completely represent the best publicly available Inuit,	Please detail the methodology used for the identification and evaluation of publicly available Inuit, Indigenous and Community Knowledge about caribou. Consult the	



IR #	IR Directed To	Subject	Reference	Issue/Concern	IR Request	Comments
		and Community Knowledge of Caribou	16.10; Volume 9 Section 24	Indigenous and Community Knowledge specific to caribou for the Project nor sufficiently encompasses historic Bathurst Caribou herd range.	appended sources which provide publicly available literature reviews regarding Inuit and Indigenous caribou knowledge.	
IR #8	WKR	Inclusion of Inuit, Indigenous and Community Knowledge for Caribou Mitigation Measures	Vol 6 16.1.1 pg. 16-4	WKR state that publicly available monitoring studies and other community-based research were reviewed to inform caribou mitigation measures, yet it is unclear from the literature cited and discussion in Volume 6 which sources were used.	Please identify which Inuit, Indigenous and Community monitoring studies and community-based research sources specific to caribou were reviewed to inform caribou mitigation measures.	Sources for review have been appended.
IR #9	WKR	Inuit, Indigenous and Community Knowledge and Engagement Feedback regarding caribou	Volume 6 Section 16.2.2.1 Table 16.7	The summary of Inuit, Indigenous and Community Knowledge and Engagement Feedback presented in Table 16.7 is confusing. It is unclear as to why concerns related to caribou from historic development projects outside of the RAA have been included as comments to the GBRP Caribou Effects Assessment. By compiling these historic concerns with Project-specific feedback by Inuit, Indigenous and Communities it gives the impression that comments were given on the Proposed Caribou Effects	Please clarify the context from which listed Indigenous and Community comments are from, and why these projects were selected as representative of Indigenous concerns about caribou and development projects.	



IR #	IR Directed To	Subject	Reference	Issue/Concern	IR Request	Comments
				Assessment for previous iterations of the Project.		
IR #10	WKR		Volume 6 Sections 16.4, 16.5 and 16.6	Throughout the Assessment of Project Effects on Caribou sections in Volume 6, it is unclear how Inuit, Indigenous and Community knowledge has independently informed contextual understandings of baseline conditions, evaluative indicators, significance assessments and the identification and development of mitigation measures and guardian monitoring programs.	Further detail is needed regarding the methodology used for the inclusion of Inuit, Indigenous and Community Knowledge into the Caribou Effects Assessment for the Project.	
IR # 11	WKR	Significance of Project Effects on the Bathurst Caribou Herd	Volume 6, Section 16.7.1.1	The significance of Project residual effects are determined to be not significant on the Bathurst Caribou herd yet there is no inclusion of Inuit, Indigenous or Community Knowledge that corroborates that determination.	Please explain how and where Inuit, Indigenous and Community Knowledge was used to evaluate Project residual effects to support the determination of Project residual effects as not significant.	
IR # 12	WKR	Significance of Cumulative Effects on the Bathurst Caribou Herd	Volume 6, Section 16.7.2.1	WKR state that residual cumulative effects of the Project and RFI physical activities are determined not to be significant based on the implementation of mitigation, management and enhancement	Please explain how Inuit, Indigenous and Community Knowledge was used to evaluate Project and RFI activities to support the determination of residual cumulative effects on the Bathurst Caribou Herd as not significant.	



IR #	IR Directed To	Subject	Reference	Issue/Concern	IR Request	Comments
				measures, but there is no inclusion of Inuit, Indigenous or Community Knowledge to support this determination.		
IR #13	WKR	Mitigation, Management and Enhancement Measures for Caribou	Volume 6 Section 16.8.4	The IS summarizes approaches to caribou mitigation and management measures based on past projects, IAG recommendations, local perspectives and scientific literature, yet does not reference or incorporate documented knowledge and expertise held by caribou land guardians in Nunavut and the Northwest Territories.	Please explain why Inuit and Indigenous guardian program expertise was not considered for review and inclusion for mitigation, management and enhancement measures related to caribou and the Project.	Sources for review have been appended.
IR #14	WKR	Holistic Valued Component Assessment	Volume 10 Table 31.1	Within the Holistic Valued Component Assessment, Table 31.1 identifies project effect pathways, primary VCs, residual effects and linked valued components. There is no discussion as to how effect pathways were identified or determined in relation to Inuit, Indigenous and Community knowledge.	Please identify how Inuit, Indigenous and Community values specifically framed the effect pathways determinations for the ecosystemic VCs in relation to caribou, TLMRU, community health and well-being, food security and food sovereignty and heritage resources.	
IR #15	WKR	Incomplete References for IK, IQ and CK	Volume 11, Appendix 37B,	The List of References does not include any publicly available Indigenous, Inuit or Community Knowledge sources. In particular,	Please demonstrate where Indigenous, Inuit or Community Knowledge sources have informed the WMMP as they are not listed in the References. In addition, explain why	Sources for review have been appended.



IR #	IR Directed To	Subject	Reference	Issue/Concern	IR Request	Comments
			Section 11	there is no reference to the rich learnings documented by current and recent guardians programs of Bathurst caribou.	literature reviews of these sources have not been referenced or included.	
IR #16	WKR	Trigger for Adaptive Management	Volume 11, Appendix 37B, Section 8.2, page 26	Triggers for adaptive management will be determined in consultation with KIA, IAG, GN and GNWT. There is no identification of other Indigenous groups that will be involved in selection and determination of triggers for adaptive management options for caribou.	Provide reasoning for non-inclusion of other Inuit and Indigenous Governments, communities and knowledge holders who have experience with the design and implementation of adaptive management plans	
IR #17	WRK	Use of Adaptive Management for the Wildlife Mitigation and Monitoring Plan	Volume 11, Appendix 37B, Section 9.0	An adaptive management framework has been included in the Wildlife Mitigation and Monitoring Plan, but there is no discussion of other approaches to environmental management such as Collaborative Adaptive management, that better facilitate the interweaving of Inuit and Indigenous Knowledge with western science.	Please identify why adaptive management process was adopted versus a collaborative adaptive management approach for the Wildlife Mitigation and Monitoring Plan.	