



BEVERLY & QAMANIRJUAQ CARIBOU MANAGEMENT BOARD

July 3, 2026

Nunavut Impact Review Board

P.O. Box 1360

Cambridge Bay, NU X0B 0C0

Sent by email: info@nirb.ca

Re: The Beverly and Qamanirjuaq Caribou Management Board Information Requests for West Kitikmeot Resources Corp.'s Grays Bay Road and Port Project Proposal, NIRB File No. 24XN038

Dear Nunavut Impact Review Board,

On behalf of the Beverly and Qamanirjuaq Caribou Management Board (BQCMB), please accept the enclosed Information Requests regarding West Kitikmeot Resources Corp.'s Impact Statement for the Grays Bay Road and Port Project.

The BQCMB is an interjurisdictional caribou co-management board with representation from Indigenous governments and organizations in Nunavut, the Northwest Territories, Saskatchewan and Manitoba, territorial and provincial governments, and the Government of Canada. The Board's mandate is to safeguard the Beverly and Qamanirjuaq barren-ground caribou herds, primarily in the interests of Indigenous peoples and communities that traditionally rely on these herds.

Consistent with this mandate, the BQCMB's Information Requests focus on barren-ground caribou and caribou harvesting communities. While the Board has a particular mandate related to the Beverly and Qamanirjuaq herds, the Board recognizes that the Project may interact with multiple barren-ground caribou herds and with communities that have relationships with and rely on caribou across jurisdictions. The enclosed Information Requests therefore focus on caribou-related information gaps and areas of uncertainty relevant to BQCMB's review of the Impact Statement.

The BQCMB notes that many caribou-related concerns raised through engagement are not only technical concerns about habitat, movement, mortality risk, or mitigation. They also reflect broader concerns about caribou harvesting, food security, cultural continuity, intergenerational knowledge transmission, and the cumulative transformation of the landscape. Often the concerns raised by communities across the Beverly and Qamanirjuaq ranges have a holistic, large-scale perspective. For these reasons, the Board's Information Requests in part focus on whether the Impact Statement clearly traces these concerns through the assessment, mitigation, monitoring, adaptive management, and significance conclusions.



BEVERLY & QAMANIRJUAQ CARIBOU MANAGEMENT BOARD

The BQCMB's Information Requests generally relate to the following themes:

- the scope of future use, third-party use, and reasonably foreseeable or induced development considered in the caribou assessment;
- cumulative effects to barren-ground caribou and caribou harvesting communities;
- the basis for conclusions regarding significance, including the use of Appendix 16B and other caribou modelling;
- road access, harvest pressure, caribou movement, road permeability, and road crossing effectiveness;
- the specificity, enforceability, monitoring, and adaptive management of proposed mitigation measures;
- the traceability of Inuit, Indigenous, and Community Knowledge and engagement concerns through the assessment; and
- the spatial information, assumptions, and uncertainty underlying the caribou assessment, including zones of influence and GIS data.

The BQCMB submits these Information Requests to clarify information gaps and areas of uncertainty in the Impact Statement and to support the Board's technical review of potential effects on barren-ground caribou and caribou harvesting communities.

Thank you for the opportunity to participate in this review process. The Board looks forward to reviewing the responses to these Information Requests.

Sincerely,

Tina Giroux-Robillard, Executive Director

cc.

Earl Evans - BQCMB Chairperson

Stephanie Behrens – BQCMB Vice-Chair, Operations

James Hodson – BQCMB Vice-Chair, Administration



BEVERLY & QAMANIRJUAQ CARIBOU MANAGEMENT BOARD

IR Source	Beverly and Qamanirjuaq Caribou Management Board
IR Number	BQCMB-IR-001
IR Directed To	West Kitikmeot Resources Corp.
Subject	Treatment of future third-party use of Project infrastructure in the effects assessment
Reference	Volume 2, Sections 1.6.3 and 2.6; Volume 6, Sections 16.4.3 and 16.4.4; Volume 10, Section 32; Volume 11, relevant Road Management Plan and Wildlife Management and Monitoring Plan sections.
Issue/Concern	<p>The Impact Statement indicates that future third-party use of Project infrastructure is not part of the Project, while also describing the Project as infrastructure designed to accommodate or support future third-party use. The BQCMB requires clarification on how these future uses were treated in the effects assessment, including whether they were assessed as part of the Project, as reasonably foreseeable future activities, as induced development, as cumulative effects, or as future activities outside the scope of the current assessment.</p> <p>This information is necessary because future use of the road, winter road, port, Jericho Station, aerodrome, quarries, borrow sources, camps, and related access or traffic could affect conclusions regarding barren-ground caribou movement, habitat disturbance, mortality risk, access, harvest pressure, cumulative effects, mitigation, monitoring, significance, and caribou harvesting communities.</p>
Information Request	<p>Please provide a consolidated explanation of how future third-party use of Project infrastructure, including the road, winter road, port, Jericho Station, aerodrome, quarries, borrow sources, camps, and related access or traffic, was treated in the Impact Statement, or identify where this information is already provided. In the response, please:</p> <ol style="list-style-type: none"> 1. identify the types of future third-party users or uses considered in the assessment, including industrial, commercial, public, recreational, and harvesting-related access, where applicable, and clarify whether each was assessed as part of the Project, as a reasonably foreseeable future activity, as a reasonably foreseeable induced activity, as a cumulative effect, or as a future activity outside the scope of the current assessment; 2. for each activity or use, identify the associated Project component, infrastructure, access route, or activity, and identify the assumptions used, including traffic levels, timing, access controls, road management, port use, and duration of use; 3. explain how those assumptions were incorporated into the assessment of effects on barren-ground caribou, including movement, habitat disturbance, mortality risk, cumulative effects, and caribou harvesting communities; 4. identify which assumptions regarding future third-party use are proposed commitments, which are conceptual or predictive assumptions, and which would depend on future authorizations, agreements, permits, or regulatory review; and



BEVERLY & QAMANIRJUAQ CARIBOU MANAGEMENT BOARD

	5. clarify what additional review, assessment, engagement, or authorization would be required if future third-party use exceeds or differs from the assumptions used in the Impact Statement.
--	---

IR Source	Beverly and Qamanirjuaq Caribou Management Board
IR Number	BQCMB-IR-002
IR Directed To	West Kitikmeot Resources Corp.
Subject	Application of Appendix 9A physical activities and RFI assumptions to the caribou cumulative-effects assessment
Reference	Appendix 9A; Volume 10, Section 32; Volume 6, Section 16; Volume 9, Volume 2, relevant Project description and future-use sections; Appendix 9A; Volume 6, Section 16; Volume 9, relevant Traditional Land, Marine and Resource Use and harvesting sections; Volume 10, Section 32; relevant Traditional Land, Marine and Resource Use and harvesting sections.
Issue/Concern	<p>Appendix 9A provides the Project Inclusion List, including past, present, reasonably foreseeable, and reasonably foreseeable induced physical activities. Volume 10 explains that each Valued Component assessment selects the activities that may interact cumulatively with that Valued Component.</p> <p>The BQCMB requires clarification on how Appendix 9A physical activities and reasonably foreseeable induced activity assumptions were applied to the assessment of effects on barren-ground caribou and caribou harvesting communities, including which activities were carried forward, which were excluded, how they were assessed, and what assumptions were used.</p> <p>This information is necessary because future development, traffic, access, harvest pressure, sensory disturbance, zones of influence, and induced activities could affect conclusions regarding caribou habitat disturbance, movement, mortality risk, cumulative effects, and caribou harvesting communities.</p>
Information Request	<p>Please provide a table showing how the physical activities identified in Appendix 9A were treated in the cumulative-effects assessment for barren-ground caribou and caribou harvesting communities, or identify where this information is already provided in the Impact Statement. In the response, please:</p> <ol style="list-style-type: none"> 1. identify each past, present, reasonably foreseeable, and reasonably foreseeable induced physical activity considered for the caribou cumulative-effects assessment; 2. indicate whether each activity was included or excluded from the caribou cumulative-effects assessment, and provide the rationale for inclusion or exclusion; 3. identify which activities were included in quantitative analyses, spatial analyses, qualitative analyses, or supporting discussion only;



BEVERLY & QAMANIRJUAQ CARIBOU MANAGEMENT BOARD

	<ol style="list-style-type: none"> 4. identify the assumptions applied to each included activity, including footprint, timing, duration, traffic or access levels, zones of influence, mitigation, operational status, and level of certainty, where applicable; 5. explain how Appendix 9A activities and reasonably foreseeable induced activity assumptions were incorporated into the assessment of effects on barren-ground caribou, including habitat disturbance, movement, mortality risk, cumulative effects, and caribou harvesting communities; 6. clarify whether the same Appendix 9A and reasonably foreseeable induced activity assumptions were applied consistently across relevant caribou herds, assessment areas, and effect pathways, and explain any differences; and 7. for any activity or assumption that was excluded, identify whether the exclusion was based on uncertainty, lack of information, timing, spatial location, regulatory status, or other screening criteria.
--	--

IR Source	Beverly and Qamanirjuaq Caribou Management Board
IR Number	BQCMB-IR-003
IR Directed To	West Kitikmeot Resources Corp.
Subject	Traceability of cumulative-effects pathways for barren-ground caribou and caribou harvesting communities
Reference	Volume 6, Section 16; Volume 10, Sections 32 and 33; Volume 4, Section 9, Appendix 9A.
Issue/Concern	<p>The Impact Statement identifies cumulative-effects pathways for caribou, including pathways related to range disturbance, habitat, movement, mortality risk, and reasonably foreseeable or induced activities. The BQCMB requires clarification on how cumulative-effects pathways for barren-ground caribou and caribou harvesting communities were identified, screened, assessed, or excluded.</p> <p>The BQCMB notes that Appendix 16B includes modelling scenarios involving the proposed Slave Geological Province Road in the NWT, reflecting the potential for broader regional cumulative effects associated with connected or interacting road infrastructure. This highlights the importance of clearly explaining how road-enabled development, access, traffic, harvest pressure, movement disruption, and other cumulative pathways were considered in the caribou assessment.</p> <p>This information is necessary to understand which cumulative-effects pathways were carried forward, which were screened out, what assumptions were used, and how those pathways informed conclusions regarding residual and cumulative effects on barren-ground caribou and caribou harvesting communities.</p>
Information Request	Please provide a table or consolidated explanation showing how cumulative-effects pathways for barren-ground caribou and caribou harvesting communities were identified, screened, assessed, and carried forward in the Impact Statement, or identify where this information is already provided. In the response, please:



BEVERLY & QAMANIRJUAQ CARIBOU MANAGEMENT BOARD

	<ol style="list-style-type: none"> 1. identify each cumulative-effects pathway considered for barren-ground caribou and caribou harvesting communities, including direct habitat loss, functional habitat loss, movement disruption, sensory disturbance, mortality risk, road and port traffic, access-related harvest pressure, induced development, dust or vegetation-related forage effects, and effects on caribou harvesting communities, where applicable; 2. indicate whether each pathway was assessed quantitatively, assessed qualitatively, addressed through mitigation or monitoring, or screened out, and provide the rationale for that treatment; 3. identify the EIS volume, section, table, appendix, or supporting document where each pathway is assessed or discussed; 4. identify the key assumptions used for each pathway, including assumptions related to traffic, road access, future users, zones of influence, timing, seasonal sensitivity, mitigation effectiveness, and reasonably foreseeable or induced development, where applicable; 5. explain how each pathway informed conclusions regarding residual and cumulative effects on barren-ground caribou and caribou harvesting communities, including any linked mitigation, monitoring, adaptive management, or follow-up measures; and 6. explain how transboundary caribou effects and concerns raised by communities and organizations outside Nunavut were considered in the cumulative-effects pathways for barren-ground caribou and caribou harvesting communities.
--	--

IR Source	Beverly and Qamanirjuaq Caribou Management Board
IR Number	BQCMB-IR-004
IR Directed To	West Kitikmeot Resources Corp.
Subject	Rationale for the temporal boundary used in the caribou cumulative-effects assessment
Reference	Volume 6, Section 16.1.4.2; Volume 10, Section 32; Volume 4, Section 9, Appendix 9A.
Issue/Concern	<p>The Impact Statement identifies the Project as long-term infrastructure. For the caribou assessment, the EIS states that Operations and Maintenance activities are anticipated to begin in 2035 and continue indefinitely, and that Project components are considered permanent infrastructure with a design life of 75 years.</p> <p>The BQCMB requires clarification on the rationale for the temporal boundary used to assess reasonably foreseeable future activities and cumulative effects on barren-ground caribou and caribou harvesting communities. Project-related effects on caribou movement, habitat use, mortality risk, access, harvesting, and induced development may occur over the long-term life of the Project and may extend beyond the selected future assessment window.</p> <p>Without this clarification, it is difficult to understand whether the cumulative-effects assessment captures longer-term effects associated with permanent road</p>



BEVERLY & QAMANIRJUAQ CARIBOU MANAGEMENT BOARD

	and port infrastructure, future third-party use, potential future access infrastructure (e.g., spur roads), delayed induced development, changes in traffic or access, climate-related range shifts, and effects over more than one caribou population cycle.
Information Request	<p>Please provide the rationale for the temporal boundary used to assess reasonably foreseeable future activities and cumulative effects on barren-ground caribou and caribou harvesting communities or identify where this information is already provided in the Impact Statement. In the response, please:</p> <ol style="list-style-type: none"> 1. identify the temporal boundary used for the caribou cumulative-effects assessment, including the future time period applied to reasonably foreseeable and reasonably foreseeable induced activities; 2. explain the rationale for selecting that temporal boundary, given that Project operations are anticipated to continue indefinitely and Project components are considered permanent infrastructure with a 75-year design life; 3. explain how longer-term effects beyond the selected future assessment window were considered, including effects related to induced development, future traffic or third-party use, access or harvest pressure, climate-related range shifts, and more than one caribou population cycle; 4. clarify whether any sensitivity analysis or qualitative assessment was completed using a longer temporal boundary for caribou cumulative effects, and provide the results or rationale if such analysis was not completed; and 5. explain how the selected temporal boundary affects conclusions regarding caribou movement, habitat disturbance, mortality risk, access, cumulative effects, significance, and caribou harvesting communities.

IR Source	Beverly and Qamanirjuaq Caribou Management Board
IR Number	BQCMB-IR-005
IR Directed To	West Kitikmeot Resources Corp.
Subject	Cautionary cumulative range disturbance, significance rationale, and mitigation response for caribou
Reference	Volume 6, Sections 16.5.1, 16.5.2, and 16.7.2; Volume 6, Tables 16.17 and 16.18; Volume 10, Section 32; Volume 4, Section 9, Appendix 9A.
Issue/Concern	<p>The Impact Statement predicts that reasonably foreseeable induced conditions would increase total disturbance in Bathurst Caribou Herd Range Assessment Area 1 to 8,818.6 km², or 11.4%, moving the area into a moderate risk or cautionary disturbance tier. The EIS also states that no additional mitigation, management, or enhancement measures are proposed beyond those identified to address Project-related effects.</p> <p>The Impact Statement nevertheless concludes that residual cumulative effects on the Bathurst Caribou Herd are not significant, based in part on the predicted magnitude and spatial extent of residual effects, expected Project mitigation, potential mitigation for reasonably foreseeable induced physical activities, and</p>



BEVERLY & QAMANIRJUAQ CARIBOU MANAGEMENT BOARD

	<p>baseline context.</p> <p>BQCMB requires clarification on the decision logic connecting the predicted cautionary cumulative disturbance condition, the significance conclusion, and the decision not to propose additional cumulative-effects mitigation, monitoring, adaptive-management thresholds, or enforceable conditions. This information is needed to understand how cumulative range disturbance, herd vulnerability, mitigation effectiveness, uncertainty, and caribou harvesting communities were considered in the caribou cumulative-effects assessment</p>
<p>Information Request</p>	<p>Please explain how the conclusion of no significant cumulative effects on caribou was reached in light of the predicted increase in cumulative range disturbance under reasonably foreseeable induced conditions or identify where this explanation is already provided in the Impact Statement. In the response, please:</p> <ol style="list-style-type: none"> 1. explain how the predicted shift of Bathurst Caribou Herd Range Assessment Area 1 into a moderate risk or cautionary disturbance tier was considered in the significance determination for cumulative effects on caribou; 2. identify the thresholds, criteria, assumptions, professional judgment, or lines of evidence used to determine that the predicted cumulative range disturbance would not result in significant cumulative effects on caribou; 3. explain how current herd status, herd vulnerability, population trend, recovery potential, movement disruption, functional habitat loss, harvest pressure, and other cumulative stressors were considered in the significance determination; 4. explain how the predicted cautionary cumulative disturbance condition was considered in determining whether additional mitigation, monitoring, adaptive-management thresholds, or enforceable conditions were required; 5. explain why no additional mitigation, management, or enhancement measures are proposed beyond those identified for Project-related effects, given the predicted cumulative disturbance under reasonably foreseeable induced conditions; 6. identify any additional cumulative-effects mitigation measures that were considered but not proposed, including regional access management, traffic limits, seasonal restrictions, road closures, coordinated monitoring, or collaborative management with governments, HTOs/HTAs, Indigenous governments and organizations, local harvesting organizations, other proponents, or caribou co-management bodies; 7. explain how uncertainty in reasonably foreseeable induced activity assumptions, mitigation effectiveness, traffic levels, access control, road use, future development timing, and caribou response was considered in the significance determination; and 8. explain how the cumulative-effects conclusion considered potential effects on caribou harvesting communities, including caribou availability, harvest access, food security, cultural continuity, and cumulative landscape change.



BEVERLY & QAMANIRJUAQ CARIBOU MANAGEMENT BOARD

IR Source	Beverly and Qamanirjuaq Caribou Management Board
IR Number	BQCMB-IR-006
IR Directed To	West Kitikmeot Resources Corp.
Subject	Treatment of Appendix 16B vulnerability assessment in the caribou effects conclusions
Reference	Volume 6, Sections 16.1.5, 16.4.7.3, 16.6.3, and 16.7.2; Appendix 16B.
Issue/Concern	<p>Appendix 16B presents a vulnerability assessment for the Bathurst, Beverly/Ahiak, and Dolphin and Union caribou herds. Section 16 of the Impact Statement describes the Caribou Herd Vulnerability Model as a tool for evaluating how climate change and human development may affect caribou exposure, movement, energy-protein balance, body condition, vital rates, and herd dynamics.</p> <p>The Impact Statement states that transboundary effects are evaluated using the Caribou Herd Vulnerability Model and therefore do not contribute to determinations of significance. However, Appendix 16B appears to provide a herd-level line of evidence relevant to caribou vulnerability, demographic risk, recovery potential, mitigation effectiveness, and population trajectory. The BQCMB notes that Appendix 16B presents modelling scenarios in which the Project, and the Project in combination with the proposed Slave Geological Province Road/Corridor scenario, appear to be associated with increased population-level effects for Bathurst caribou. These model outcomes appear difficult to reconcile with the conclusion that residual and cumulative effects on the Bathurst herd are not significant.</p> <p>Appendix 16B also links road or infrastructure exposure to assumed behavioural changes, including reduced foraging and increased walking or running, which are then modelled as changes in body condition, pregnancy rates, calf survival, and population trajectory. The BQCMB requires clarification on the evidence supporting these behavioural and energetic assumptions, whether they were validated for the herds modelled in Appendix 16B, and how uncertainty in these assumptions was considered.</p> <p>The BQCMB requires clarification on how Appendix 16B and the Caribou Herd Vulnerability Model results were used, weighted, limited, or excluded in the assessment of residual and cumulative effects on caribou. This information is needed to understand the basis for the significance conclusions for barren-ground caribou and related conclusions regarding caribou harvesting communities.</p>
Information Request	<p>Please explain how Appendix 16B and the Caribou Herd Vulnerability Model results were used, weighted, limited, or excluded in the caribou effects assessment, or identify where this explanation is already provided in the Impact Statement. In the response, please:</p> <ol style="list-style-type: none"> 1. explain why CHVM results were used to inform transboundary effects but did not contribute to determinations of significance for residual or cumulative effects on caribou; 2. explain whether predicted population change, demographic risk, recovery potential, or population trajectory were considered as effect measures,



BEVERLY & QAMANIRJUAQ CARIBOU MANAGEMENT BOARD

	<p>indicators, or lines of evidence in the caribou significance determination, and if not, explain why;</p> <ol style="list-style-type: none"> 3. explain how Appendix 16B results related to body condition, pregnancy rates, calf survival, and projected population trend were considered in relation to conclusions that residual and cumulative effects on caribou are not significant; 4. identify the weight assigned to Appendix 16B relative to other lines of evidence, including range disturbance, habitat disturbance, movement, mortality risk, health, Inuit, Indigenous, and Community Knowledge, professional judgment, and proposed mitigation; 5. explain how uncertainty in Appendix 16B assumptions and outputs was considered, including uncertainty related to exposure assumptions, zones of influence, traffic levels, hunting pressure, mitigation effectiveness, climate scenarios, population projections, and behavioural or energetic assumptions such as reduced foraging, increased walking or running, reduced body condition, pregnancy rates, and calf survival; 6. clarify whether the behavioural and energetic assumptions used in Appendix 16B were validated for the Bathurst, Beverly/Ahiak, or Dolphin and Union herds, or were transferred from studies of other herds, development types, or regional contexts; 7. clarify whether the mitigation scenarios assessed in Appendix 16B correspond to enforceable Project commitments, including traffic management, road closures, hunting restrictions, access controls, TARP measures, Mobile Caribou Conservation Measures, or other mitigation relied upon in the caribou assessment; 8. clarify which herd or herd grouping is represented by “Beverly/Ahiak” in Appendix 16B, including whether the modelling refers to the present-day Beverly herd, the Ahiak herd, the Northeast Mainland herds, or another herd grouping, and explain how this definition affects interpretation of the modelling results; 9. identify the most recent Bathurst population estimates, demographic information, calf:cow ratios, survival information, and emigration information used in Appendix 16B and the caribou effects assessment, including whether the 2025 GNWT estimate of approximately 3,609 caribou and recent information on continuing decline were considered, and explain how those data were incorporated into the vulnerability assessment and significance conclusions; and 10. explain whether Bluenose-East caribou were considered for vulnerability modelling, and if excluded, provide the rationale for exclusion.
--	---

IR Source	Beverly and Qamanirjuaq Caribou Management Board
IR Number	BQCMB-IR-007
IR Directed To	West Kitikmeot Resources Corp.
Subject	Authority, responsibility, and uncertainty for mitigation assumed for future users and RFI activities



BEVERLY & QAMANIRJUAQ CARIBOU MANAGEMENT BOARD

Reference	Volume 6, Sections 16.5.2, 16.5.4, 16.5.5, 16.7.3, 16.8.6, and 16.9; Volume 10, Section 32; Volume 11, relevant Road Management Plan and Wildlife Management and Monitoring Plan sections.
Issue/Concern	<p>The Impact Statement relies on mitigation, management, and enhancement measures to reduce Project and cumulative effects on caribou, including measures related to Project design, TARP, Mobile Caribou Conservation Measures, adaptive road closures, traffic management, convoying, speed limits, wildlife right-of-way, access control, hunting restrictions, monitoring, and follow-up.</p> <p>The Impact Statement also indicates that some mitigation measures are expected to extend to reasonably foreseeable induced physical activities, and that similar or more stringent mitigation may be required for RFI projects or future users. However, it is not clear which of these measures are within WKR’s authority or control, which are assumptions about future regulatory requirements or future proponents, and which depend on future agreements, permits, authorizations, management plans, land-tenure arrangements, or third-party compliance.</p> <p>The BQCMB requires clarification on the authority, responsibilities, limitations, and uncertainty associated with caribou mitigation measures relied upon in the caribou assessment, particularly where implementation may depend on future third-party users or proponents of reasonably foreseeable induced activities. This information is necessary to understand which mitigation assumptions are enforceable Project commitments, which are outside WKR’s direct control, and how that uncertainty was considered in conclusions regarding residual and cumulative effects on barren-ground caribou and caribou harvesting communities.</p>
Information Request	<p>Please clarify the authority, responsibility, and assumptions associated with caribou mitigation measures relied upon for future third-party users and reasonably foreseeable induced activities or identify where this information is already provided in the Impact Statement. In the response, please:</p> <ol style="list-style-type: none"> 1. identify each caribou mitigation, management, enhancement, monitoring, or adaptive-management measure assumed to apply to future third-party users or RFI proponents, including TARP measures, Mobile Caribou Conservation Measures, adaptive road closures, traffic management, convoying, speed limits, wildlife right-of-way procedures, access controls, hunting restrictions, reporting requirements, and caribou monitoring; 2. identify which measures are binding Project commitments, which are within WKR’s direct authority or control, which are assumptions about future regulatory requirements or third-party practices, which depend on future permits, authorizations, agreements, land-tenure arrangements, or management plans, and which are conceptual measures to be developed later; 3. identify the legal, regulatory, contractual, land-tenure, access-agreement, or operational mechanisms, if any, through which WKR could require or encourage future third-party users of Project infrastructure to comply with caribou mitigation measures;



BEVERLY & QAMANIRJUAQ CARIBOU MANAGEMENT BOARD

	<ol style="list-style-type: none"> 4. identify whether any of the mitigation measures assumed to apply to future third-party users or RFI proponents would require new or amended legislation, regulations, permit conditions, access agreements, land-tenure arrangements, management plans, or other instruments to be implemented or enforced, and identify who would be responsible for establishing and enforcing those requirements; 5. clarify the limits of WKR’s authority over RFI proponents or future users that use, connect to, or rely on Project infrastructure, including authority related to road access, port access, traffic management, road closures, monitoring, reporting, and compliance; 6. explain what regional coordination mechanisms are assumed or proposed among WKR, future users, RFI proponents, governments, HTOs/HTAs, Indigenous governments and organizations, local harvesting organizations, and caribou co-management bodies; 7. describe how compliance with caribou mitigation measures within WKR’s control would be monitored, documented, reported, and enforced; 8. identify which assumptions about future-user or RFI-proponent mitigation were relied upon in the significance determinations for residual and cumulative effects on caribou; and 9. explain how uncertainty or lack of WKR authority over future users, RFI proponents, future mines, spur roads, or other connected infrastructure was considered in the caribou effects assessment and significance conclusions.
--	--

IR Source	Beverly and Qamanirjuaq Caribou Management Board
IR Number	BQCMB-IR-008
IR Directed To	West Kitikmeot Resources Corp.
Subject	Access control, harvest pressure, and caribou harvesting communities
Reference	Volume 6, Sections 16.2.2.1, 16.4.3, 16.4.4, 16.7.3, and 16.9; Volume 9, Sections 24 and 25; Volume 10, Sections 32 and 33; Volume 11, relevant Road Management Plan and Wildlife Mitigation and Monitoring Plan sections.
Issue/Concern	<p>The Impact Statement identifies access control as a key mitigation measure to limit illegal harvesting and poaching and concludes that increased harvest pressure on caribou is expected to be low. The EIS states that users seeking access to the Project Road for harvesting purposes would require prior approval from the Kitikmeot Inuit Association and an Inuit Wildlife Organization/HTA, and that these permits are expected to align with current tagging systems and total allowable harvest requirements.</p> <p>The BQCMB requires clarification on how access control would be implemented, monitored, enforced, and adapted over the life of the Project. This information is necessary because new all-season road and port infrastructure could change access to caribou, harvest pressure, caribou availability, unauthorized access risk, and harvesting patterns, including for communities and Indigenous groups that rely on barren-ground caribou across jurisdictions.</p>



BEVERLY & QAMANIRJUAQ CARIBOU MANAGEMENT BOARD

	<p>The BQCMB also requires clarification on the capacity, resourcing, and administrative requirements associated with the access-control system, particularly where the Impact Statement assumes roles for KIA, HTOs/HTAs, Inuit Wildlife Organizations, Indigenous governments and organizations, local harvesting organizations, or co-management bodies in reviewing, approving, monitoring, reporting on, or enforcing access and harvest-related permits. Without this information, it is difficult to understand whether the access-control measures relied upon in the assessment are practicable, adequately supported, and enforceable over the life of the Project. The IS cannot rely on access-control systems involving HTAs/Inuit organizations without explaining whether those systems will be supported with the capacity to do so.</p> <p>The BQCMB also requires clarification on the harvest estimates, assumptions, data sources, and uncertainty used to support the conclusion that increased harvest pressure would be low. This is particularly important because harvest regimes, reporting requirements, and access controls differ across jurisdictions and herds, and experience from other northern roads and winter roads indicates that improved access can increase harvest pressure where caribou are available near roads. Access-control assumptions may also become less reliable if the Project Road becomes part of a broader regional transportation network, connects to other road infrastructure, or is used by a wider range of future users over time. Without this information, it is difficult to understand how access-related mortality risk and effects on caribou harvesting communities were assessed and how those effects would be detected and managed if they are greater than predicted.</p>
<p>Information Request</p>	<p>Please provide additional detail on how access control, harvest pressure, and effects on caribou harvesting communities were assessed and would be managed, or identify where this information is already provided in the Impact Statement. In the response, please:</p> <ol style="list-style-type: none"> 1. describe the proposed access-control system for the Project Road, winter road, port, Jericho Station, aerodrome, quarries, borrow sources, camps, and other Project infrastructure, including gates, checkpoints, permits, patrols, signage, communication protocols, electronic monitoring, or other access-control measures, where applicable; 2. identify the parties responsible for granting, denying, tracking, monitoring, and enforcing access for employees, contractors, future third-party users, harvesters, community members, commercial users, recreational users, and emergency users; 3. explain how harvesting-related access permits would be coordinated with KIA, HTOs/HTAs, territorial harvest-management systems, total allowable harvest requirements, Indigenous governments and organizations, local harvesting organizations, and caribou co-management bodies; 4. explain what capacity, resourcing, administrative systems, and coordination support would be required for KIA, HTOs/HTAs, Inuit Wildlife Organizations, Indigenous governments and organizations, local harvesting organizations, or co-management bodies to carry out any access-approval,



BEVERLY & QAMANIRJUAQ CARIBOU MANAGEMENT BOARD

	<p>monitoring, reporting, or compliance roles assumed in the Impact Statement, and how any gaps would be addressed;</p> <ol style="list-style-type: none"> 5. explain how unauthorized access, illegal harvest, poaching, wastage, non-compliance with access restrictions, or non-compliance with harvest-related permit conditions would be detected, reported, and addressed; 6. identify the harvest estimates, assumptions, data sources, and uncertainty used to assess potential road-related harvest of Bathurst, Beverly/Ahiak, Bluenose-East, Dolphin and Union, or other barren-ground caribou that may use the area; 7. explain whether the assessment considered higher-harvest scenarios based on experience with other northern roads, winter roads, industrial roads, or improved access routes, and if not, explain why; 8. explain how the assessment considered caribou herds, communities, or jurisdictions where harvest limits, tags, reporting requirements, or access controls may differ from those assumed in the EIS; 9. identify what indicators would be used to monitor changes in harvest pressure, access patterns, caribou availability, harvest success, unauthorized access, hunter travel routes, and effects on caribou harvesting communities; 10. identify monitoring frequency, reporting responsibilities, and adaptive-management responses if access, harvest pressure, or effects on caribou harvesting communities are greater than predicted; and 11. explain how access-control and harvest-pressure assumptions, including uncertainty about future traffic levels, public or third-party use, road connectivity, and WKR's ability to control access over time, were incorporated into conclusions regarding caribou mortality risk, movement, cumulative effects, significance, and caribou harvesting communities.
--	--

IR Source	Beverly and Qamanirjuaq Caribou Management Board
IR Number	BQCMB-IR-009
IR Directed To	West Kitikmeot Resources Corp.
Subject	Caribou TARP, conditional mitigation, and adaptive-management triggers
Reference	Volume 6, Sections 16.4.3, 16.4.4, 16.7.3, and 16.9; Volume 11, Appendix 34B, Wildlife Mitigation and Monitoring Plan; Volume 11, Appendix 37A, Road Management Plan.
Issue/Concern	<p>The Impact Statement identifies the caribou Trigger Action Response Plan, Mobile Caribou Conservation Measures, adaptive road closures, traffic management, speed limits, wildlife right-of-way, convoying, monitoring, and access controls as important measures to reduce effects on caribou movement, habitat, mortality risk, and cumulative effects.</p> <p>The EIS states that Mobile Caribou Conservation Measures will be implemented as part of the TARP framework to initiate adaptive road closures during migration, calving, and post-calving, and that lead caribou or collar movements on a trajectory to cross the road would result in suspension of vehicle traffic. The EIS also states</p>



BEVERLY & QAMANIRJUAQ CARIBOU MANAGEMENT BOARD

	<p>that follow-up monitoring will be used to test the effectiveness of mitigation, management, and enhancement measures and update management strategies, including components of the TARP, as needed.</p> <p>The BQCMB requires clarification on the operational details of the caribou TARP and related conditional mitigation measures. This information is needed because the caribou effects assessment relies on these measures to reduce predicted effects, but the available information does not clearly identify the triggers, thresholds, response levels, decision-makers, implementation timelines, enforcement mechanisms, monitoring indicators, or adaptive-management responses that would apply if caribou effects are greater than predicted.</p>
<p>Information Request</p>	<p>Please provide the draft caribou Trigger Action Response Plan, Mobile Caribou Conservation Measures, Road Management Plan provisions, Wildlife Mitigation and Monitoring Plan provisions, and road-use protocols relied upon in the caribou effects assessment, or identify where this information is already provided in the Impact Statement. In the response, please:</p> <ol style="list-style-type: none"> 1. identify the caribou monitoring indicators, criteria, thresholds, or triggers that would initiate mitigation, including indicators related to caribou distance from infrastructure, group size, cow-calf groups, direction of movement, crossing behaviour, season, herd, life stage, traffic levels, and repeated or prolonged interaction with Project infrastructure; 2. identify the response levels or action categories under the TARP and Mobile Caribou Conservation Measures, including the criteria for escalating or de-escalating between response levels; 3. describe the mitigation actions associated with each response level, including traffic delays, conveying, speed reductions, temporary road closures, seasonal restrictions, access restrictions, work stoppages, communication protocols, wildlife right-of-way procedures, or other measures; 4. identify the operational criteria for implementing and ending mitigation actions, including closure distances, closure duration, speed limits, stopping distances, stopping duration, line-of-sight criteria, conveying requirements, criteria for reopening the road, and criteria for resuming vehicle movement when caribou or other wildlife are near or crossing the road; 5. identify the responsible decision-makers for each mitigation action, including who has authority to initiate, modify, extend, or end road closures, traffic restrictions, work stoppages, or other caribou-related mitigation; 6. clarify which TARP actions and related mitigation measures would be mandatory, which would be discretionary, how quickly actions would be implemented after triggers are met, and how compliance would be enforced, documented, and reported; 7. explain how road users, contractors, harvesters, future users, communities, regulators, HTOs/HTAs, Indigenous governments and organizations, local



BEVERLY & QAMANIRJUAQ CARIBOU MANAGEMENT BOARD

	<p>harvesting organizations, and caribou co-management bodies would be notified when TARP actions or road restrictions are implemented;</p> <ol style="list-style-type: none"> 8. explain how the effectiveness of TARP measures would be monitored, including indicators such as crossing success, avoidance, delays, deflection, stress behaviour, collision risk, harvest pressure, and repeated caribou-road interactions, and identify what adaptive-management responses would be implemented if effects are greater than predicted; 9. clarify whether the TARP and related conditional mitigation measures would apply to contractors, future third-party users, and proponents of reasonably foreseeable or induced activities that use or connect to Project infrastructure; and 10. identify which measures are proposed commitments, which are conceptual measures to be developed later, and which would depend on future approvals, agreements, permits, management plans, or third-party compliance. Where triggers, thresholds, or response actions have not yet been finalized, provide the draft trigger levels, the proposed process and timeline for finalizing them, the parties to be involved, and how those triggers were assumed in the caribou effects assessment.
--	---

IR Source	Beverly and Qamanirjuaq Caribou Management Board
IR Number	BQCMB-IR-010
IR Directed To	West Kitikmeot Resources Corp.
Subject	Road permeability, caribou movement, and crossing effectiveness
Reference	Volume 6, Sections 16.4.3, 16.5.4, 16.7.3, and 16.9; Appendix 16A; Appendix 16B; Volume 11, Appendix 34B, Wildlife Mitigation and Monitoring Plan; Volume 11, Appendix 37A, Road Management Plan.
Issue/Concern	<p>The Impact Statement recognizes that roads and related Project activities may create physical or perceptual filters to caribou movement and may affect local movement, road-crossing locations and timing, migration timing, and movement routes. The EIS predicts that combined Project effects on Bathurst caribou movement would be moderate in magnitude and primarily associated with the Project road.</p> <p>The EIS also indicates that road design, traffic management, speed limits, conveying, wildlife right-of-way procedures, TARP-related measures, Mobile Caribou Conservation Measures, and adaptive road closures would reduce effects on caribou movement and help maintain road permeability. However, the BQCMB requires clarification on the evidence, criteria, assumptions, monitoring indicators, and adaptive-management responses used to support the conclusion that Project roads would remain sufficiently permeable for barren-ground caribou movement.</p> <p>This information is needed because road-crossing delays, deflection, avoidance, repeated crossing attempts, failed crossings, altered migration timing, or changes in movement routes could affect caribou movement, energetic costs, access to</p>



BEVERLY & QAMANIRJUAQ CARIBOU MANAGEMENT BOARD

	seasonal ranges, mortality risk, cumulative effects, and caribou harvesting communities.
Information Request	<p>Please provide additional detail on how road permeability and caribou crossing effectiveness were assessed and how they would be monitored and adaptively managed, or identify where this information is already provided in the Impact Statement. In the response, please:</p> <ol style="list-style-type: none">1. explain the criteria, benchmarks, or lines of evidence used to determine that Project roads would remain sufficiently permeable for barren-ground caribou movement;2. identify the assumptions used regarding road design, embankment height and slope, snowbank management, traffic volumes, traffic timing, convoying, speed limits, road closures, wildlife right-of-way procedures, and other traffic-management measures;3. identify any road segments, terrain conditions, bridge approaches, water crossings, quarries, pullouts, intersections, snowbank conditions, or other locations where caribou crossing may be more difficult, delayed, or less likely;4. explain how crossing delay, deflection, avoidance, repeated crossing attempts, failed crossings, stress behaviour, and changes in migration timing or route selection were considered in the movement assessment;5. explain whether road permeability was assessed differently by season, herd, life stage, or sensitivity period, including calving, post-calving, migration, late summer, rut, and winter;6. identify the road-barrier, road-crossing, and road-avoidance studies or monitoring results considered in the assessment, including studies from other northern roads where migratory caribou have experienced crossing delays, deflection, avoidance, or reduced crossing success, and explain how those studies or results were used to assess potential effects on Bathurst, Beverly/Ahiak, Bluenose-East, and Dolphin and Union caribou movement;7. identify how caribou crossing effectiveness would be monitored during construction, operations, and maintenance, including indicators, methods, reporting frequency, responsible parties, and thresholds or monitoring results that would trigger additional mitigation or adaptive management;8. explain how future third-party use, increased traffic, road connectivity, or reasonably foreseeable induced activities were considered in evaluating long-term road permeability; and9. explain how road-permeability assumptions were incorporated into conclusions regarding caribou movement, habitat use, mortality risk, cumulative effects, significance, and caribou harvesting communities.



BEVERLY & QAMANIRJUAQ CARIBOU MANAGEMENT BOARD

IR Source	Beverly and Qamanirjuaq Caribou Management Board
IR Number	BQCMB-IR-011
IR Directed To	West Kitikmeot Resources Corp.
Subject	Dolphin-Union caribou sea-ice migration and shipping-season assumptions
Reference	Volume 2, relevant Project description and shipping sections; Volume 6, Section 16 and Appendix 16A; Volume 9, relevant Traditional Land, Marine and Resource Use and food security sections; Volume 10, Section 33.
Issue/Concern	<p>The Impact Statement recognizes that Dolphin and Union caribou seasonally migrate between Victoria Island and the mainland across sea ice and may interact with the Project during mainland winter use and seasonal migration. The EIS also recognizes that climate warming or increased shipping that extends the ice-free season may delay migratory movement, make sea-ice crossings more dangerous, or shorten the period that Dolphin and Union caribou spend on the mainland. Inuit Knowledge reported by hunters from Cambridge Bay indicates that Dolphin and Union caribou may be particularly vulnerable during southward sea-ice migration in late October and November, when sea ice may still be thin.</p> <p>The Impact Statement states that icebreaking facilitated by the Project will not affect Dolphin and Union caribou migration because the Project Port will be operational only during the open-water shipping season, typically late June through October. The BQCMB requires clarification on whether open-water-only shipping is a binding limitation on the Project as assessed, how the shipping season is defined, and whether any future extension of the shipping season, icebreaking, ice management, or shoulder-season shipping would fall outside the current assessment and require further review.</p> <p>This information is necessary to understand how shipping-season assumptions were incorporated into conclusions regarding Dolphin and Union caribou movement, mortality risk, transboundary effects, Traditional Land, Marine and Resource Use, food security, and caribou harvesting communities.</p>
Information Request	<p>Please clarify how the Project’s shipping season and port-operation assumptions were considered in relation to Dolphin and Union caribou sea-ice migration, or identify where this information is already provided in the Impact Statement. In the response, please:</p> <ol style="list-style-type: none"> 1. identify the expected annual shipping season for deep-water vessels, including anticipated start and end dates, variability, and whether those dates may change over the life of the Project; 2. clarify whether Project-related shipping is limited to open-water conditions and whether that limitation is a binding Project assumption, design commitment, regulatory requirement, or current operational assumption; 3. explain whether icebreaking, ice management, shoulder-season shipping, or shipping during periods relevant to Dolphin and Union caribou sea-ice migration is included in or excluded from the Project as assessed;



BEVERLY & QAMANIRJUAQ CARIBOU MANAGEMENT BOARD

	<ol style="list-style-type: none"> 4. explain how Dolphin and Union caribou fall, winter, and spring sea-ice migration timing, staging areas, mortality risk, and sea-ice vulnerability were considered in the caribou assessment; 5. explain how shipping-season assumptions were incorporated into conclusions regarding Dolphin and Union caribou movement, mortality risk, transboundary effects, Traditional Land, Marine and Resource Use, food security, and caribou harvesting communities; 6. identify what additional assessment, regulatory review, engagement, or approvals would be required if future Project operations proposed icebreaking, ice management, shoulder-season shipping, or an extended shipping season that could affect Dolphin and Union caribou sea-ice migration; and 7. identify any monitoring, reporting, or adaptive-management measures that would be used to detect and respond to Project-related effects on Dolphin and Union caribou migration or related harvesting concerns.
--	--

IR Source	Beverly and Qamanirjuaq Caribou Management Board
IR Number	BQCMB-IR-012
IR Directed To	West Kitikmeot Resources Corp.
Subject	Future barren-ground caribou range shifts, herd recovery scenarios, and sensitivity of assessment conclusions
Reference	Volume 6, Sections 16.2.2, 16.8.6, and 16.9; Appendix 16A; Appendix 16B.
Issue/Concern	<p>The Impact Statement includes substantial information on barren-ground caribou distribution, seasonal ranges, movements, habitat selection, and cumulative disturbance. For Bathurst caribou, the Impact Statement uses long-term collar datasets and seasonal range information, including collar data from 1996 to 2024 and seasonal ranges developed from 1996 to 2023 collar data. The Impact Statement also recognizes uncertainty related to future conditions, including climate change, natural disturbance, caribou herd dynamics, and future development.</p> <p>The BQCMB requires clarification on whether the caribou assessment conclusions were tested under plausible future changes in herd abundance, distribution, seasonal range use, or recovery scenarios over the life of the Project. This is important because the Bathurst herd's overall range and seasonal ranges have contracted as the herd has declined, but areas used less frequently in recent years may become important again if the herd recovers or resumes use of former seasonal ranges.</p> <p>The BQCMB also requires clarification on how the Impact Statement considered potential limitations of collar-derived seasonal ranges and movement models when assessing future overlap with the Project. Collar datasets may have limitations related to spatial and temporal coverage, sample size, sex and age class, collar deployment locations, herd assignment, herd mixing, and areas or seasons with</p>



BEVERLY & QAMANIRJUAQ CARIBOU MANAGEMENT BOARD

	<p>limited collar coverage. This is particularly important where Inuit Knowledge, Indigenous Knowledge, community knowledge, or historical range information identifies areas of current, past, or potential future caribou use that may not be fully captured in collar-derived seasonal ranges, migration models, or habitat-selection models.</p> <p>This information is necessary because future range expansion, recovery, contraction, or shifts in seasonal range use could change the degree of overlap between barren-ground caribou, Project infrastructure, future third-party use, and reasonably foreseeable or induced development. Without this clarification, it is difficult to understand whether conclusions regarding caribou movement, habitat disturbance, mortality risk, cumulative effects, significance, and caribou harvesting communities remain robust under plausible future caribou-range scenarios.</p>
<p>Information Request</p>	<p>Please clarify whether the caribou assessment conclusions were tested under plausible future barren-ground caribou range-shift, herd-recovery, resumption of former seasonal ranges, or seasonal-use scenarios, or identify where this information is already provided in the Impact Statement. In the response, please:</p> <ol style="list-style-type: none"> 1. identify any future range-shift, range-expansion, range-contraction, herd-recovery, resumption of former seasonal ranges, or seasonal-use scenarios considered for barren-ground caribou over the life of the Project; 2. explain whether future range expansion, recovery, or seasonal range shifts were considered for Bathurst caribou, including potential changes in calving, post-calving, migration, late-summer, rut, or winter range overlap with the Project and reasonably foreseeable or induced development; 3. explain whether and how earlier periods of Bathurst range use, including periods when the herd was more abundant, were considered when assessing potential future overlap with Project infrastructure and induced development; 4. explain whether potential future interactions with Bluenose-East and Beverly/Ahiak caribou were considered, including future distribution, overlap, cumulative-effects scenarios, and the rationale for the level of assessment applied to each herd; 5. identify whether any spatial sensitivity analysis or qualitative sensitivity assessment was completed to test how caribou conclusions would change under larger, shifted, contracted, alternative, or knowledge-informed seasonal ranges, including areas of current, historical, or potential future use identified through Inuit Knowledge, Indigenous Knowledge, community knowledge, or other information sources not fully captured by collar-derived datasets, and provide the results or rationale if such analysis was not completed; 6. explain whether the collar datasets used to define seasonal ranges, movement corridors, habitat selection, and potential Project overlap were considered representative of the current, historical, and potential future range of each herd assessed, including any limitations related to sample size, spatial or temporal coverage, sex or age class, collar deployment



BEVERLY & QAMANIRJUAQ CARIBOU MANAGEMENT BOARD

	<p>patterns, herd assignment, herd mixing, or areas/seasons with limited collar coverage;</p> <ol style="list-style-type: none"> 7. explain how Inuit Knowledge, Indigenous Knowledge, community knowledge, and historical range information were used to identify, verify, or supplement areas of current, historical, or potential future caribou use that may not be fully captured by collar-derived seasonal ranges, movement models, or habitat-selection models; 8. explain how future changes in caribou distribution, abundance, seasonal range use, or overlap with Project infrastructure and reasonably foreseeable or induced development could affect conclusions regarding habitat disturbance, movement, mortality risk, access, cumulative effects, significance, and caribou harvesting communities; and 9. identify what follow-up monitoring would be used to detect changes in herd distribution, seasonal range overlap, movement, or crossing behaviour over the life of the Project.
--	---

IR Source	Beverly and Qamanirjuaq Caribou Management Board
IR Number	BQCMB-IR-013
IR Directed To	West Kitikmeot Resources Corp.
Subject	Consolidated spatial overlays for the caribou effects assessment
Reference	Volume 6, Section 16.1.4.1 and Figures 16.1 to 16.17; Appendix 16A; Volume 10, Section 32; Volume 4, Section 9, Appendix 9A.
Issue/Concern	<p>The Impact Statement includes multiple caribou maps and spatial analyses, including figures showing caribou assessment boundaries, Bathurst seasonal ranges, peak calving areas, migration routes, Kitikmiut Knowledge of caribou calving and migration, Dolphin and Union range and migration information, zones of influence, and seasonal habitat ratings under Project and reasonably foreseeable induced conditions.</p> <p>However, the BQCMB requires consolidated spatial overlays showing how key spatial layers used in the caribou assessment relate to one another. This information is needed to evaluate whether the selected herd focus, assessment boundaries, cumulative-effects assumptions, mitigation conclusions, and conclusions regarding barren-ground caribou and caribou harvesting communities are spatially supported.</p> <p>Without consolidated overlays, it is difficult to review how Project components, assessment boundaries, seasonal ranges, movement routes, calving and post-calving areas, zones of influence, reasonably foreseeable or induced activities, and harvesting-related spatial information overlap.</p>
Information Request	Please provide consolidated maps or spatial overlays showing the relationship among Project components, assessment boundaries, caribou herd information, reasonably foreseeable or induced activities, zones of influence, and harvesting-



BEVERLY & QAMANIRJUAQ CARIBOU MANAGEMENT BOARD

related spatial information, or identify where equivalent consolidated maps are already provided in the Impact Statement. In the response, please provide maps showing, where available and appropriate:

1. the Project Development Area, Local Assessment Area, Regional Assessment Areas, road, winter road, port, Jericho Station, aerodrome, quarries, borrow sources, camps, and other relevant Project components;
2. reasonably foreseeable and reasonably foreseeable induced activities included in the caribou cumulative-effects assessment, including associated footprints, roads, infrastructure, and zones of influence;
3. seasonal ranges, calving and post-calving areas, migration corridors, movement routes, water crossings, movement-model outputs, and other spatial information used for Bathurst, Bluenose-East, Beverly/Ahiak, Dolphin and Union, or other caribou herds considered in the assessment;
4. zones of influence used for Project components and reasonably foreseeable or induced activities;
5. known caribou harvesting areas, travel routes, camps, or other harvesting-related spatial information considered in the assessment, with sensitive information generalized, aggregated, or provided through an appropriate confidential process where necessary;
6. areas where Project components, future users, or reasonably foreseeable or induced activities overlap with higher-use, sensitive, or selected seasonal caribou habitat; and
7. the data sources, years, methods, scale, and limitations for each mapped layer.

IR Source	Beverly and Qamanirjuaq Caribou Management Board
IR Number	BQCMB-IR-014
IR Directed To	West Kitikmeot Resources Corp.
Subject	Traceability of Inuit, Indigenous, and Community Knowledge in the caribou assessment
Reference	Volume 3, Sections 4, 5, and 6; Volume 6, Sections 16.1.1, 16.2.2.1, 16.7.3, 16.8.6, and 16.9; Volume 6, Table 16.7; Appendix 16A; Volume 10, Section 33.
Issue/Concern	<p>The Impact Statement states that Inuit, Indigenous, and Community Knowledge informed the caribou effects assessment, including assessment boundaries, baseline conditions, effects pathways, cumulative effects, significance, mitigation, management, enhancement measures, and follow-up monitoring. Volume 6 also provides a summary of caribou-related knowledge and engagement feedback, WKR responses, and locations where issues are addressed.</p> <p>The BQCMB recognizes that the Impact Statement includes substantial discussion of Inuit, Indigenous, and Community Knowledge. However, the BQCMB requires</p>



BEVERLY & QAMANIRJUAQ CARIBOU MANAGEMENT BOARD

	<p>clearer traceability showing how specific knowledge inputs related to barren-ground caribou were carried through the technical assessment and how they influenced assessment boundaries, herd selection, temporal boundaries, effects pathways, cumulative-effects assumptions, mitigation, monitoring, adaptive management, and significance conclusions.</p> <p>This information is needed because caribou-related knowledge and concerns are not only technical observations about habitat, movement, mortality risk, or mitigation. They also relate to caribou harvesting, food security, cultural continuity, intergenerational knowledge transmission, and the cumulative transformation of the landscape. Without a clearer crosswalk, it is difficult to understand how these knowledge inputs shaped the assessment of effects on barren-ground caribou and caribou harvesting communities.</p>
<p>Information Request</p>	<p>Please provide a table or crosswalk showing how Inuit, Indigenous, and Community Knowledge related to barren-ground caribou was considered and carried through the caribou assessment, or identify where this information is already provided in the Impact Statement. In the response, please:</p> <ol style="list-style-type: none"> 1. identify the key Inuit, Indigenous, and Community Knowledge inputs related to barren-ground caribou, including information on movement corridors, migration routes, calving and post-calving areas, water crossings, road disturbance, cumulative effects, caribou health, predation, harvest access, harvest pressure, and caribou harvesting communities; 2. identify the source or type of source for each knowledge input, while respecting confidentiality, consent, intellectual property, and data-governance requirements; 3. explain how each knowledge input informed assessment boundaries, herd selection, temporal boundaries, future scenarios, effects pathways, cumulative-effects assumptions, mitigation, monitoring, adaptive management, or significance conclusions; 4. identify any knowledge inputs that were summarized in the EIS but did not affect the technical assessment, mitigation design, monitoring, adaptive management, or conclusions, and explain why; 5. explain how knowledge from transboundary Indigenous groups and other potentially affected caribou harvesting communities was considered in relation to barren-ground caribou effects and harvesting impacts; 6. clarify how Inuit, Indigenous, and Community Knowledge would be incorporated into caribou monitoring, adaptive management, TARP implementation, road-closure decisions, Mobile Caribou Conservation Measures, Inuit monitor, Guardian, or related roles, and follow-up over the life of the Project; and 7. explain how future knowledge shared through monitoring, engagement, or co-management processes would be used to update mitigation, adaptive management, and effects predictions if caribou effects are greater than predicted.



BEVERLY & QAMANIRJUAQ CARIBOU MANAGEMENT BOARD

IR Source	Beverly and Qamanirjuaq Caribou Management Board
IR Number	BQCMB-IR-015
IR Directed To	West Kitikmeot Resources Corp.
Subject	Tracking of caribou-related engagement concerns and recommendations
Reference	Volume 3, Sections 4, 5, and 6; Volume 6, Section 16.2.2.1 and Table 16.7; Volume 9, Sections 24 and 25; Volume 10, Sections 33.2, 33.4.3, and 33.5.1.
Issue/Concern	<p>The Impact Statement includes summaries of engagement and caribou-related concerns, including Volume 6, Table 16.7, which summarizes Inuit, Indigenous, and Community Knowledge and engagement feedback regarding the caribou effects assessment. The EIS also includes broader engagement, Traditional Land, Marine and Resource Use, food security, and transboundary-effects sections relevant to caribou and caribou harvesting communities.</p> <p>The BQCMB requires clarification on how caribou-related concerns and recommendations raised through engagement were tracked, responded to, incorporated, or identified as unresolved. This includes concerns related to caribou movement, migration, calving and post-calving areas, road crossings, road disturbance, cumulative effects, future development, access, harvest pressure, caribou health, monitoring, mitigation, adaptive management, and caribou harvesting communities.</p> <p>This information is needed to understand whether caribou-related concerns and recommendations resulted in changes to Project design, routing, assessment boundaries, effects pathways, mitigation, monitoring, adaptive management, access management, TARP measures, or significance conclusions, and whether any concerns remain unresolved or require further engagement.</p>
Information Request	<p>Please provide a table summarizing how caribou-related concerns and recommendations raised through engagement were addressed in the Impact Statement, or identify where this information is already provided. In the response, please:</p> <ol style="list-style-type: none"> 1. identify key caribou-related concerns and recommendations raised by Kitikmiut, other Indigenous groups, transboundary communities, HTOs/HTAs, Indigenous governments and organizations, local harvesting organizations, caribou co-management bodies, and other potentially affected communities; 2. include concerns and recommendations related to caribou movement, migration, calving and post-calving areas, road crossings, road disturbance, cumulative effects, future development, access, harvest pressure, caribou health, predation, monitoring, mitigation, adaptive management, and caribou harvesting communities; 3. identify where each concern or recommendation is addressed in the EIS, including the relevant volume, section, table, appendix, management plan, or supporting document; 4. explain whether each concern or recommendation resulted in changes to Project design, routing, assessment boundaries, effects pathways, future scenarios,



BEVERLY & QAMANIRJUAQ CARIBOU MANAGEMENT BOARD

	<p>mitigation, monitoring, adaptive management, access management, TARP measures, or significance conclusions; and</p> <p>5. identify any caribou-related concerns or recommendations that were not incorporated, remain unresolved, or require further engagement, monitoring, or adaptive-management planning, and explain how they would be tracked, reported, and addressed over the life of the Project.</p>
--	---

IR Source	Beverly and Qamanirjuaq Caribou Management Board
IR Number	BQCMB-IR-016
IR Directed To	West Kitikmeot Resources Corp.
Subject	Caribou considerations in alternatives, routing, and design trade-offs
Reference	Volume 2; Volume 6, Section 16; Appendix 16A; Appendix 16B.
Issue/Concern	<p>The Impact Statement includes Volume 2 on Project description and alternatives, and the caribou assessment in Volume 6 assesses effects of the selected Project alignment and Project components on barren-ground caribou. The caribou assessment identifies spatial relationships among the Project, Bathurst caribou seasonal ranges, migration routes, calving and post-calving areas, movement pathways, and habitat.</p> <p>The BQCMB requires clarification on how caribou-related information was considered during alternatives evaluation, route selection, and design refinement for the Project. This includes clarification on whether alternatives, routing refinements, or mitigation-by-design options were compared based on potential effects to caribou seasonal ranges, migration routes, road-crossing locations, habitat disturbance, cumulative effects, access, harvest pressure, and caribou harvesting communities.</p> <p>The proposed road corridor appears to overlap with areas identified in the caribou assessment as important to Bathurst caribou, including seasonal range areas. The BQCMB requires clarification on whether alternative corridors, routing refinements, or mitigation-by-design options that would reduce interaction with caribou ranges, particularly Bathurst seasonal ranges, were considered.</p> <p>This information is needed to understand whether and how caribou-related considerations influenced the selected Project design and how those alternatives or routing assumptions were carried forward into the caribou effects assessment, mitigation, monitoring, and significance conclusions.</p>
Information Request	<p>Please explain how barren-ground caribou considerations were incorporated into the evaluation of alternatives, route selection, and design refinements for the Project, or identify where this information is already provided in the Impact Statement. In the response, please:</p> <ol style="list-style-type: none"> 1. identify the alternatives, route options, design refinements, or mitigation-by-design measures considered to avoid or reduce effects on barren-ground caribou;



BEVERLY & QAMANIRJUAQ CARIBOU MANAGEMENT BOARD

	<p>2. explain what caribou-related criteria were used to compare alternatives or design options, including criteria related to seasonal ranges, calving and post-calving areas, migration routes, road-crossing locations, habitat disturbance, cumulative effects, access, harvest pressure, and caribou harvesting communities;</p> <p>3. explain whether and how information on Bathurst, Beverly/Ahiak, Bluenose-East, Dolphin and Union, or other relevant barren-ground caribou was used in alternatives, routing, or design decisions;</p> <p>4. explain whether longer-term, historical, or broader seasonal range information was considered in alternatives or routing decisions, including periods when the Bathurst herd was more abundant or used areas differently than in recent years;</p> <p>5. identify whether alternatives or design options were compared using spatial analyses, modelling, Inuit, Indigenous, or Community Knowledge, engagement feedback, or professional judgment related to caribou effects;</p> <p>6. explain whether Appendix 16B, caribou movement data, seasonal range mapping, zones of influence, or cumulative-disturbance analyses were used to compare route or design options, and if not, explain why;</p> <p>7. identify any caribou-related avoidance or mitigation-by-design options that were considered but not carried forward, and provide the rationale; and</p> <p>8. explain how caribou-related trade-offs considered during alternatives analysis were carried forward into the caribou effects assessment, mitigation, monitoring, and adaptive management.</p>
--	---

IR Source	Beverly and Qamanirjuaq Caribou Management Board
IR Number	BQCMB-IR-017
IR Directed To	West Kitikmeot Resources Corp.
Subject	Dust, vegetation, forage quality, and caribou habitat effects
Reference	Volume 5, Section 11; Volume 6, Sections 15, 16.4.2, 16.4.5, 16.4.6, and 16.9; Appendix 16A; Volume 11, relevant Air Quality Management Plan and Wildlife Mitigation and Monitoring Plan sections.
Issue/Concern	<p>The Impact Statement recognizes that dust deposition and vegetation alteration may affect caribou habitat effectiveness and forage quality, including lichens and other forage used by barren-ground caribou. The EIS also recognizes potential exposure pathways related to dust inhalation and ingestion of plants such as lichens, while concluding that Project-related chemical contamination pathways did not need to be carried forward beyond the ecological risk assessment problem formulation.</p> <p>The Impact Statement concludes that effects on actual forage, including vascular plants and lichens, are expected to be minimal within 1 km of the Project Development Area and negligible at the broader Regional Assessment Area scale, and that dust control will reduce indirect effects on forage quality and palatability.</p> <p>The BQCMB requires clarification on how dust deposition, vegetation change, forage quality, forage palatability, and lichen-related effects were carried through</p>



BEVERLY & QAMANIRJUAQ CARIBOU MANAGEMENT BOARD

	<p>the caribou assessment. This information is needed to understand the basis for the minimal/negligible forage-effect conclusion, how forage-related effects were linked to caribou habitat, health, movement, cumulative effects, and caribou harvesting communities, and how these predictions would be monitored and adaptively managed.</p>
Information Request	<p>Please explain how dust deposition, vegetation change, forage quality, forage palatability, and lichen-related effects were considered in the assessment of effects on barren-ground caribou, or identify where this information is already provided in the Impact Statement. In the response, please:</p> <ol style="list-style-type: none"> 1. explain how predicted dust deposition from roads, quarries, borrow sources, camps, the port, the aerodrome, and other Project components was assessed in relation to caribou forage quality, palatability, and habitat use; 2. identify which caribou forage types, landcover classes, or habitat variables were considered in the assessment, including lichens, shrub-lichen-moss, grass-lichen-moss, sedges, shrubs, and other vegetation types selected or used by caribou; 3. explain how dust, vegetation alteration, or forage-quality effects were incorporated into the assessment of caribou habitat, health, movement, mortality risk, cumulative effects, and caribou harvesting communities; 4. explain the basis for the conclusion that effects on actual forage would be minimal within 1 km of the Project Development Area and negligible at the broader Regional Assessment Area scale; 5. explain whether dust and forage-quality effects were assessed differently by season, herd, habitat type, or sensitivity period, including calving, post-calving, migration, late summer, rut, and winter; 6. identify whether cumulative dust or vegetation effects from reasonably foreseeable or induced activities were included in the caribou assessment, and if so, how; 7. identify the dust, vegetation, forage-quality, lichen, or caribou habitat monitoring that would be implemented, including methods, indicators, locations, frequency, responsible parties, and thresholds or monitoring results that would trigger additional mitigation or adaptive management; and 8. explain how monitoring results would be reported to affected communities, Indigenous governments and organizations, HTOs/HTAs, local harvesting organizations, and caribou co-management bodies.

IR Source	Beverly and Qamanirjuaq Caribou Management Board
IR Number	BQCMB-IR-018
IR Directed To	West Kitikmeot Resources Corp.
Subject	GIS data, spatial methods, and mapping uncertainty for the caribou assessment
Reference	Volume 6, Sections 16.1.4.1, 16.2.1, 16.2.2, 16.4.2, 16.4.3, 16.5.2, 16.5.4, 16.8.3, and 16.8.6; Appendix 16A; Appendix 16B; Volume 10, Section 32; Volume 4, Section 9, Appendix 9A.



BEVERLY & QAMANIRJUAQ CARIBOU MANAGEMENT BOARD

<p>Issue/Concern</p>	<p>The Impact Statement relies on multiple spatial datasets and spatial analyses to support the caribou effects assessment, including Project footprints, assessment boundaries, seasonal caribou ranges, movement information, peak calving areas, resource selection functions, habitat ratings, zones of influence, reasonably foreseeable and induced activity footprints, and cumulative range-disturbance calculations.</p> <p>The EIS and Appendix 16A describe the use of collar data, KDE seasonal range mapping, BBMM movement analyses, RSF habitat modelling, landcover datasets, Project and RFI disturbance layers, and zones of influence. The EIS also identifies uncertainty related to landcover resolution, habitat modelling, movement analyses, exposure calculations, and future conditions.</p> <p>The BQCMB requires access to the GIS layers, spatial summaries, metadata, spatial methods, and uncertainty information necessary to understand and review the spatial basis of the caribou assessment. This information is needed to evaluate the basis for conclusions regarding barren-ground caribou habitat, movement, mortality risk, cumulative effects, significance, and caribou harvesting communities. Where underlying data cannot be provided because of confidentiality, sensitivity, data ownership, or licensing constraints, the BQCMB requires clarification on those constraints and the provision of suitable generalized, aggregated, or summary information.</p>
<p>Information Request</p>	<p>Please provide the GIS layers, spatial summaries, metadata, methods, and uncertainty information necessary to understand and review the spatial basis of the caribou effects assessment, or identify where this information is already provided. Where underlying data cannot be provided because of confidentiality, sensitivity, data ownership, or licensing constraints, please identify those constraints and provide suitable generalized, aggregated, or summary information. In the response, please provide, where available and appropriate:</p> <ol style="list-style-type: none"> 1. GIS layers or spatial summaries for the Project Development Area, Local Assessment Area, Regional Assessment Areas, road, winter road, port, Jericho Station, aerodrome, quarries, borrow sources, camps, and other relevant Project components; 2. GIS layers or spatial summaries for reasonably foreseeable and reasonably foreseeable induced activities included in the caribou cumulative-effects assessment, including disturbance footprints, roads, infrastructure, and zones of influence; 3. GIS layers or spatial summaries for caribou seasonal ranges, movement corridors, migration routes, water crossings, crossing areas, calving and post-calving areas, peak calving areas, habitat ratings, RSF outputs, BBMM outputs, and other caribou habitat or movement information used in the assessment; 4. GIS layers or spatial summaries showing zones of influence used for Project components, baseline disturbances, reasonably foreseeable activities, and reasonably foreseeable induced activities;



BEVERLY & QAMANIRJUAQ CARIBOU MANAGEMENT BOARD

	<p>5. metadata for each spatial layer or spatial summary, including data source, year or date range, projection, scale or resolution, processing steps, classification method, validation method, assumptions, and limitations;</p> <p>6. methods used to create key spatial products, including seasonal ranges, KDE outputs, peak calving areas, BBMM movement corridors, RSF habitat ratings, ZOI buffers, Project/RFI disturbance layers, and cumulative range-disturbance calculations;</p> <p>7. an explanation of how spatial uncertainty, collar-data limitations, landcover-classification uncertainty, modelling uncertainty, ZOI uncertainty, and data gaps were considered in the caribou assessment;</p> <p>8. an explanation of how sensitive information, including harvesting areas, camps, travel routes, water crossings, or culturally sensitive spatial data, can be provided in generalized, aggregated, or confidential form where necessary; and</p> <p>9. an explanation of how spatial-data limitations or uncertainty could affect conclusions regarding caribou habitat, movement, mortality risk, cumulative effects, significance, and caribou harvesting communities.</p>
--	---

IR Source	Beverly and Qamanirjuaq Caribou Management Board
IR Number	BQCMB-IR-019
IR Directed To	West Kitikmeot Resources Corp.
Subject	Zones of influence and sensitivity of caribou disturbance conclusions
Reference	Volume 6, Sections 16.4.2, 16.5.2, and 16.8.3; Volume 6, Tables 16.17 and 16.18; Appendix 16B.
Issue/Concern	<p>Appendix 16B presents a vulnerability assessment for the Bathurst, Beverly/Ahiak, and Dolphin and Union caribou herds. Section 16 of the Impact Statement describes the Caribou Herd Vulnerability Model as a tool for evaluating how climate change and human development may affect caribou exposure, movement, energy-protein balance, body condition, vital rates, and herd dynamics.</p> <p>The Impact Statement states that transboundary effects are evaluated using the Caribou Herd Vulnerability Model and therefore do not contribute to determinations of significance. However, Appendix 16B appears to provide a herd-level line of evidence relevant to caribou vulnerability, demographic risk, recovery potential, mitigation effectiveness, and population trajectory. The BQCMB notes that Appendix 16B presents modelling scenarios in which the Project, and the Project in combination with the proposed Slave Geological Province Road/Corridor scenario, appear to be associated with increased population-level effects for Bathurst caribou. These model outcomes appear difficult to reconcile with the conclusion that residual and cumulative effects on the Bathurst herd are not significant.</p> <p>Appendix 16B also links road or infrastructure exposure to assumed behavioural changes, including reduced foraging and increased walking or running, which are then modelled as changes in body condition, pregnancy rates, calf survival, and population trajectory. The BQCMB requires clarification on the evidence supporting</p>



BEVERLY & QAMANIRJUAQ CARIBOU MANAGEMENT BOARD

	<p>these behavioural and energetic assumptions, whether they were validated for the herds modelled in Appendix 16B, and how uncertainty in these assumptions was considered.</p> <p>The BQCMB requires clarification on how Appendix 16B and the Caribou Herd Vulnerability Model results were used, weighted, limited, or excluded in the assessment of residual and cumulative effects on caribou. This information is needed to understand the basis for the significance conclusions for barren-ground caribou and related conclusions regarding caribou harvesting communities.</p>
<p>Information Request</p>	<p>Please explain how Appendix 16B and the Caribou Herd Vulnerability Model results were used, weighted, limited, or excluded in the caribou effects assessment, or identify where this explanation is already provided in the Impact Statement. In the response, please:</p> <ol style="list-style-type: none"> 1. explain why CHVM results were used to inform transboundary effects but did not contribute to determinations of significance for residual or cumulative effects on caribou; 2. explain whether predicted population change, demographic risk, recovery potential, or population trajectory were considered as effect measures, indicators, or lines of evidence in the caribou significance determination, and if not, explain why; 3. explain how Appendix 16B results related to body condition, pregnancy rates, calf survival, and projected population trend were considered in relation to conclusions that residual and cumulative effects on caribou are not significant; 4. identify the weight assigned to Appendix 16B relative to other lines of evidence, including range disturbance, habitat disturbance, movement, mortality risk, health, Inuit, Indigenous, and Community Knowledge, professional judgment, and proposed mitigation; 5. explain how uncertainty in Appendix 16B assumptions and outputs was considered, including uncertainty related to exposure assumptions, zones of influence, traffic levels, hunting pressure, mitigation effectiveness, climate scenarios, population projections, and behavioural or energetic assumptions such as reduced foraging, increased walking or running, reduced body condition, pregnancy rates, and calf survival; 6. clarify whether the behavioural and energetic assumptions used in Appendix 16B were validated for the Bathurst, Beverly/Ahiak, or Dolphin and Union herds, or were transferred from studies of other herds, development types, or regional contexts; 7. clarify whether the mitigation scenarios assessed in Appendix 16B correspond to enforceable Project commitments, including traffic management, road closures, hunting restrictions, access controls, TARP measures, Mobile Caribou Conservation Measures, or other mitigation relied upon in the caribou assessment; 8. clarify which herd or herd grouping is represented by “Beverly/Ahiak” in Appendix 16B, including whether the modelling refers to the present-day



BEVERLY & QAMANIRJUAQ CARIBOU MANAGEMENT BOARD

	<p>Beverly herd, the Ahiak herd, the Northeast Mainland herds, or another herd grouping, and explain how this definition affects interpretation of the modelling results;</p> <ol style="list-style-type: none">9. identify the most recent Bathurst population estimates, demographic information, calf:cow ratios, survival information, and emigration information used in Appendix 16B and the caribou effects assessment, including whether the 2025 GNWT estimate of approximately 3,609 caribou and recent information on continuing decline were considered, and explain how those data were incorporated into the vulnerability assessment and significance conclusions; and10. explain whether Bluenose-East caribou were considered for vulnerability modelling, and if excluded, provide the rationale for exclusion.
--	--