



Inuvialuit Game Council

July 3rd, 2026

Nunavut Impact Review Board
29 Mitik St
Cambridge Bay, Nunavut
X0B 0C0

Information Requests from the Inuvialuit Game Council - NIRB File No. 24XN038, West Kitikmeot Resources Corp's Grays Bay Road and Port Project Impact Statement

The Inuvialuit Game Council (IGC) is submitting information requests to the Nunavut Impact Review Board (NIRB) in response to the May 6th letter to the parties seeking information requests on West Kitikmeot Resource Corporation's (WKR) Impact Statement for its proposed Grays Bay Road and Port Project.

IGC understands the intent of the NIRB information requests is to provide parties with an opportunity to review WKR's impact statement and to highlight areas that aren't addressed, incomplete, or would impact a meaningful review.

Based on this understanding, IGC has written 3 information requests which will focus on impacts to Inuvialuit harvesting rights within the Inuvialuit Settlement Region from the Grays Bay Road and Port Project.

IGC's information requests are presented in the format requested by NIRB. IGC looks forward to seeing how their comments and concerns are addressed during the review phase.

For any questions or concerns, please contact Xavier St-Jacques (igccordinator@jointsec.nt.ca) or Davonna Kagyut (igc-rp@jointsec.nt.ca).

Sincerely,

Dean Arey

Chair, **Inuvialuit Game Council**

CC:

Xavier St-Jacques – IGC Resource Management Coordinator

IGC Information Requests

The Joint Secretariat – Inuvialuit Game Council
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IGC-001

IR Source:	Inuvialuit Game Council
IR Number:	IGC-001
IR Directed To:	West Kitikmeot Resources Corp.
Subject:	Marine Mammal Disturbance and impacts to Inuvialuit harvesting from increased project related marine shipping within the Inuvialuit Settlement Region
Reference:	<p>Grays Bay Road and Port Project – Impact Statement, Volume 8: Marine Environment</p> <ul style="list-style-type: none"> - Section 23: Marine Mammals - Section 23.3.3: Change in Behaviour Caused by Sensory Disturbance - Section 23.3.4: Change in mortality and/or Injury Risk - Section 23.4: Assessment of Cumulative Effects - Appendix 23A: Marine Mammal Baseline Report
Issue/Concern:	<p>The Inuvialuit Game Council (IGC) is concerned that the Impact Statement does not adequately assess the potential effects of increased project related marine shipping on marine mammals and Inuvialuit harvesting activities within the Inuvialuit Settlement Region (ISR).</p> <p>The impact statement states that project related shipping is expected to occur from spring to fall and would have limited overlap with harvesting activities. However, the impact statement does not appear to consider the beluga harvesting within the ISR which occurs during July to August/September, which means there will be an overlap with the project shipping season and periods of increased vessel activity.</p> <p>The impact statement does not appear to provide sufficient information regarding:</p> <ul style="list-style-type: none"> - Potential impacts of vessel traffic on beluga harvesting success and harvesting access - Cumulative underwater noise levels from increased shipping from the project - The extent to which Inuvialuit Knowledge and harvesting information informed the assessment <p>Marine Mammals, including beluga, bowhead whale, ringed seal, and bearded seal, are central to Inuvialuit harvesting rights which are protected under the Inuvialuit Final Agreement (IFA) and Section 35 of the Constitution Act, 1982.</p>
Information Request:	1.



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	<p>A) Provide the complete marine mammal baseline dataset relied upon in Section 23 of Volume 8 of the impact statement, including species occurrence, seasonal abundance and distribution, movement corridors, survey methodologies, spatial coverage, and years of data collection.</p> <p>B) Clarify whether the baseline surveys and assessment boundaries included waters within the Inuvialuit Settlement Region.</p> <p>2. Provide a quantified assessment of projected underwater noise levels associated with project related vessel traffic, including cumulative seasonal noise levels, vessel traffic assumption, and species specific disturbance threshold for beluga, bowhead whale, ringed seal, and bearded seal.</p> <p>3. Clarify how the assessment concluded that project shipping would have limited overlap with Inuvialuit harvesting activities as beluga harvesting within the ISR occurs during July and August, which overlaps with the project shipping season.</p> <p>4. Identify all proposed mitigation measures intended to reduce impacts to marine mammals and Inuvialuit harvesting activities within the ISR, including vessel speed restrictions, seasonal operational measures, marine mammals’ observation protocols, and adaptive management measures. Provide the evidence for how effective each mitigation measure would be.</p> <p>5. Clarify whether Inuvialuit Knowledge, harvesting observations, or information provided by the Inuvialuit Game Council (IGC), Fisheries Joint Management Committee (FJMC), Joint Secretariat (JS), or Inuvialuit Hunter and Trappers Committees (HTC) were incorporated into the marine mammal assessment. If not, provide the rationale for their exclusion and describe how much engagement was done with Inuvialuit co-management boards and Inuvialuit Knowledge holders during the development of marine mammal baseline and effects assessment.</p>
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IGC-002

IR Source:	Inuvialuit Game Council
IR Number:	IGC-002
IR Directed To:	West Kitikmeot Resources Corp.
Subject:	Caribou Herd Fragmentation, Wildlife Movement, Increased Access, and Cumulative Effects on Inuvialuit Harvesting Within the Inuvialuit Settlement Region
Reference:	Grays Bay Road and Port Project – Impact Statement, Volume 6: Terrestrial Environment:



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	<ul style="list-style-type: none">- Section VS.6 Scope of the Terrestrial Environment Assessment- Section VS.6.3 Caribou- Section VS.6.3.1 Baseline- Section VS.6.3.2 Project Effects- Section VS.6.3.3 Cumulative Effects- Section VS.6.3.4 Significance- Section VS.6.3.5 Mitigation, Management, and Enhancement Measures
Issue/Concern:	<p>The Inuvialuit Game Council (IGC) is concerned that the impact statement does not adequately assess the potential long-term effects of the proposed all-season road corridor and associated industrial traffic on migratory caribou movement, habitat connectivity, and Inuvialuit harvesting activities within the Inuvialuit Settlement Region (ISR).</p> <p>The project corridor is located within a broader regional landscape used by migratory barren-ground caribou herds relied upon by Inuvialuit beneficiaries, including the Dolphin and Union herd, the Bluenose-East herd, and the Bluenose-West herd. These herds are critical to Inuvialuit harvesting rights protected under the Inuvialuit Final Agreement (IFA) and Section 35 of the Constitution Act, 1982.</p> <p>The impact statement identifies project-related effects on wildlife movement and mortality risk, including sensory disturbance, vehicle traffic, increased access, and habitat fragmentation. The impact statement also states that increased access to the road may increase wildlife mortality risk and harvesting pressure.</p> <p>The Inuvialuit Game Council is concerned that the assessment does not evaluate:</p> <ul style="list-style-type: none">- Potential disruption of migratory caribou movement between Nunavut and the ISR/NWT.- Fragmentation of movement corridors used by the Dolphin and Union herd and Bluenose herds.- Indirect impacts on Inuvialuit harvesting success, harvesting access, travel safety, and predictability of caribou availability.- The extent to which Inuvialuit Knowledge informed conclusions regarding wildlife movement and cumulative effects. <p>The Inuvialuit Game Council is quite concerned that the conclusion of the residual and cumulative effects is deemed “not significant” under Section VS.6.6. This statement does not appear to be supported by sufficient</p>



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	analysis of long-term movement data and cumulative effects on migratory caribou herds relied upon by Inuvialuit within the ISR.
Information Request:	<ol style="list-style-type: none"> 6. Provide all spatial mapping, datasets, and technical information relied upon in the assessment of caribou movement and cumulative effects. This includes migration routes, seasonal movement corridors, and areas identified as important to caribou. 7. Provide the methods and assumptions used to assess potential project-related effects on caribou movement and habitat fragmentation. This includes effects of traffic, noise, sensory disturbance, increased human access, and cumulative industrial developmental impacts. 8. Clarify how the assessment evaluated the potential for the project road corridor, associated traffic, and increased regional access to disrupt migratory movement and habitat connectivity for caribou herds that Inuvialuit rely upon. Explain how the potential impact on harvesting access, harvesting success, and food security within the ISR was assessed. 9. Provide all assumptions regarding projected traffic volumes throughout the operational life of the project. Including potential future third-party or induced industrial access. 10. Identify and explain all proposed mitigation and monitoring measures referenced in Section VS.6.3.5, which are intended to reduce impacts to caribou movement and Inuvialuit harvesting activities, including access controls, wildlife crossings, speed limits, traffic measurement measures, and adaptive management commitments. Provide the evidence for the effectiveness of these measures in Arctic environments. 11. Clarify whether Inuvialuit Knowledge, harvesting observations, or information provided by the Inuvialuit Game Council (IGC), Wildlife Management Advisory Council - Northwest Territories (WMAc NWT), Joint Secretariat (JS), or Inuvialuit Hunter and Trappers Committees (HTC) were incorporated into the terrestrial environmental assessment. If not, provide the rationale for their exclusion and describe how much engagement was done with Inuvialuit co-management boards and Inuvialuit Knowledge holders during the development of the terrestrial environment baseline and effects assessment.

IGC-003

IR Source:	Inuvialuit Game Council
IR Number:	IGC-003

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IR Directed To:	West Kitikmeot Resources Corp.
Subject:	Effects of Increased Marine Vessel Traffic and Potential Icebreaking Activities on Polar Bears and Inuvialuit Harvesting of Polar Bears Within the Inuvialuit Settlement Region
Reference:	<p>Grays Bay Road and Port Project – Impact Statement, Volume 8: Marine Environment:</p> <ul style="list-style-type: none"> - Section VS.8.3 Marine Mammals - Section 23.1.1 – Influence of Engagement and Inuit, Indigenous, and Community Knowledge on the Assessment - Section 23.1.6 – Significance Definition - Section 23.2.2.4 – Marine Mammal Occurrence (Polar Bear) - Section 23.3.3 – Change in Behaviour Caused by Sensory Disturbance - Section 23.3.4 – Change in Mortality and/or Injury Risk - Section 23.3.7 – Effects of Climate Change on Marine Mammals - Section 23.4.3 – Cumulative Effects: Change in Behaviour Caused by Sensory Disturbance - Section 23.4.4 – Cumulative Effects: Change in Mortality and/or Injury Risk - Table 23.16 – Summary of Annual Project-Related and Reasonably Foreseeable Induced Vessel Traffic (2035–2055) - Figure 23.10 – Northwest Passage Shipping Route and Project Access Corridor - Appendix 23A – Marine Mammal Baseline Report
Issue/Concern:	<p>The Inuvialuit Game Council (IGC) is concerned that the impact statement does not properly assess the potential effects of increased marine vessel traffic associated with the proposed Grays Bay Port on polar bears (<i>Ursus maritimus</i>) and on the Inuvialuit harvesting of polar bears within the Inuvialuit Settlement Region (ISR).</p> <p>Polar bears are listed as a Species of Special Concern under the Species at Risk Act (SARA) as well under the Northwest Territories Species at Risk Act and are recognized as Vulnerable by the International Union for Conservation of Nature (IUCN). The Northern Beaufort Sea subpopulation, estimated at approximately 1,291 polar bears, has an area that spans over portions of the Coronation Gulf, Banks Island, and the broader Beaufort Sea region. Polar bear harvesting is of cultural, nutritional, and economic importance to Inuvialuit beneficiaries. Inuvialuit polar bear harvesting rights are protected under the Inuvialuit Final Agreement (IFA) and Section 35 of the Constitution Act, 1982.</p> <p>During the Operations and Maintenance Phase (2035-2055), the project is expected to generate 45+ vessels transiting annually in each direction of</p>



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	<p>through the Coronation Gulf, with 20+ of these vessels transiting through the ISR (Table 23.16). This means the project related induced shipping will extend beyond the projects Regional Assessment Area, and into the ISR in areas that Inuvialuit beneficiaries harvest. The IGC is concerned the assessment does not properly evaluate:</p> <ul style="list-style-type: none">- The effects of increased shipping on Inuvialuit polar bear harvesting, including potential displacement of bears from traditional hunting areas and cumulative impacts on food security and harvesting rights under the IFA and Section 35 of the Constitution Act, 1982.- The implications of climate driven sea ice loss, identified in the impacts statement's own climate projections for polar bear distribution, habitat use, and vulnerability to vessel disturbance within the ISR. <p>The IGC is quite concerned that the conclusion that residual and cumulative effects on polar bears are “not significant” is not supported by adequate species specific analysis, especially a SARA listed species whose population is poorly understood and whose habitat and use of ISR marine areas is changing.</p>
Information Request:	<p>12. Provide all spatial data, survey records, and technical information relied upon in the assessment of polar bear distribution, habitat use, and occurrence within any area of the ISR that could be affected by vessel traffic from the Grays Bay Road and Port. This would include any information on polar bear usage of sea ice, coastal denning, and travel corridors.</p> <p>13. Explain how the observations of polar bears returning to the Coronation Gulf area which was documented through Indigenous Knowledge; was factored into the baseline characterization, effects assessments, and cumulative effects. If this was not incorporated, please explain the reason for its exclusion from the assessment.</p> <p>14. Clarify the nature and extent of engagement with Inuvialuit co-management bodies on potential effects of the project on polar bears and Inuvialuit polar bear harvesting in the ISR. Specifically: (a) describe what information was shared with and received from the IGC, WMAC NWT, Joint Secretariat, and relevant Hunters and Trappers Committees regarding marine mammal and polar bear</p>



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	<p>effects; (b) describe how Inuvialuit Knowledge related to polar bears in the ISR was incorporated into the marine mammal assessment; and (c) identify all proposed mitigation and monitoring measures applicable to polar bears along ISR shipping routes, confirm whether these extend to third-party vessels using project infrastructure, and provide evidence for their effectiveness in Arctic marine environments.</p>
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