VIA EMAIL (info@nirb.ca)

July 3, 2026

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

Re: Information Requests for West Kitikmeot Resources Corp.'s "Grays Bay Road and Port" Project Proposal (NIRB File No: 24XN038)

Dear Ms. Gillard,

As part of the NIRB's review of West Kitikmeot Resources Corp.'s *Grays Bay Road and Port Impact Statement*, please find attached to the present a list of requests for information ("IRs") submitted on behalf of Nunavut Tunngavik Inc. ("NTI").

We note that NTI has had the chance to review the IRs developed by the Kitikmeot Inuit Association and that it supports these IRs and the necessity of the further information requested therein.

Please let us know if you require any further information regarding NTI's proposed IRs.

Dustin Fredlund
Chief Operating Officer

ᓄᓇᕗᑦ ᑐᙵᕕᒃ ᑎᒥᖓᑦ
300-922 ᓯᕗᒧᒋᐊᖅ ᐊᖅᑯᑎ
ᐃᖃᓗᐃᑦ, ᓄᓇᕗᑦ
X0A 3H0

Nunavut Tunngavik Timingat
300-922 Sivumugiaq St
Iqaluit, NU
X0A 3H0

Nunavut Tunngavik Incorporated
300-922 Sivumugiaq St
Iqaluit, NU
X0A 3H0

(867) 975-4900
1-888-646-0006
(867) 975-4949

IR Source:	Nunavut Tunngavik Inc.
IR Number:	NTI-1
IR Directed To:	West Kitikmeot Resources Corp.
Subject:	Grays Bay Road's Zone of Influence (ZOI)
Reference:	Volume 6, p. 16-16, p. 16-32, p. 16-89, pp. 16-100-102; Volume 6, Appendix 16B, pp. 32-33, p. 46; Volume 11, Appendix 37B, p. 24.
Issue/Concern:	The road's ZOI is of crucial importance to the assessment of potential impacts on caribou, as it essentially delineates the Local Assessment Area (LAA), or "the maximum predicted extent of Project-related environmental effects, both direct and indirect, on caribou that can be predicted or measured with a reasonable degree of accuracy and confidence" (Volume 6, p. 16-16). An unmitigated ZOI of 4 km is proposed, with a reduction to 1 km through mitigation, management and enhancement measures—despite that "in general, the effectiveness of mitigation has been weakly demonstrated" (Volume 6, Appendix 16B, p. 46). Since it is expected that mitigative measures will be applied, a road ZOI of 1 km has apparently been used in the calculation of caribou exposure rates. The caribou vulnerability assessment (Appendix 16B) however assumed a road ZOI of 5 km, pointing out that caribou can reportedly see haul trucks 2 km away and noting that ZOI estimates of over 15 km along roads prior to caribou crossing have been documented elsewhere. Additional justification and uncertainty evaluation are required to assess effects predictions and significance determinations.
Information Requests:	1) Provide technical basis and sensitivity analyses for the selected 1 km ZOI or provide evidence that mitigation can reduce responses from 4–5 km to 1 km; and 2) Provide sensitivity analyses for alternative ZOIs (2, 4, 5, 10 km and variable-distance).

IR Source:	Nunavut Tunngavik Inc.
IR Number:	NTI-2
IR Directed To:	West Kitikmeot Resources Corp.
Subject:	ZOI and Caribou Migration Corridor
Reference:	Volume 6, p. 16-65, p. 16-66 (Figure 16.5), p. 16-67 (Figure 16.6); Volume 6, Appendix 16A, pp. 61-62.
Issue/Concern:	The IS reports on the existence of a fairly consistent Bathurst caribou spring migration corridor, along a northeastern trajectory from winter range to calving grounds, intersecting the southernmost 50 km of the Project's road. The fixed-distance ZOI approach may not adequately characterize a road's effects on caribou behaviour in instances where it intersects a major migration corridor.
Information Requests:	1) Explain, providing supporting analyses, why the presence of an intersecting migration corridor has not been deemed to have any bearing on the road's ZOI; and 2) Provide modelling weighing the potential impact of increasing traffic volumes on the ZOI in the vicinity of where the migration corridor intersects the road.

IR Source:	Nunavut Tunngavik Inc.
IR Number:	NTI-3
IR Directed To:	West Kitikmeot Resources Corp.
Subject:	Effects Thresholds and Inuit Harvesting
Reference:	Volume 1, p. NTS-9, p. ES-30, pp. MD-93-94; Volume 3, p. 5-7; Volume 6, p. VS.6-9, p. 16-27; Volume 9, pp. VS.9-6-7, pp. VS.9-9-10, pp. 24-15-16, p. 24-158.
Issue/Concern:	While Project residual and cumulative effects on traditional land, marine and resource use (TLMRU) are predicted to be 'not significant' with the application of mitigation, management and enhancement measures, varied effects on the traditional food system are acknowledged throughout the IS. For instance, long-term adverse residual effects associated with Project effects on caribou range and movement and on the quality or perceived quality of caribou as country food are anticipated to be of moderate magnitude for the stability and availability (and thus utilization) of caribou, a key species for the traditional food system. Although increased hunting travel time, costs and distances are mentioned with respect to the potential alteration of cultural transference opportunities, the treatment of these intermediate outcomes is not readily accessible. TLMURU by Inuit is already significantly restricted by the establishment of conservation measures for the Bathurst caribou herd (moratorium in the NWT and TAH of 10 bulls in Nunavut). In these circumstances, additional or cumulative effects on Inuit food security and sovereignty cannot intuitively be seen as insignificant.
Information Requests:	1) Explain how the threshold for moderate magnitude residual effects is apparently higher than the agreed upon threshold for unacceptable effects; 2) Provide details on current or anticipated programs, policies or mitigation measures that are relied upon to bring down residual and cumulative effects to a point where Inuit TLMRU activities can continue at, or near, current levels; 3) Explain the usefulness of setting such a high threshold (greatly reduced or eliminated) for high magnitude residual effects on TLMRU activities; 4) Discuss intermediate outcomes (e.g., reduced access to and availability of caribou, increased hunting effort);

	5) Discuss how current low abundance of Bathurst caribou and limitations on Inuit hunting have factored in the definition of thresholds and significance determination; and 6) Explain how the expected annual mortality of 1 to 5 caribou due to Project-related vehicle collisions, and facilitated harvest and predation, is considered 'minimal' when the Nunavut TAH is currently set at 10 bull caribou.

IR Source:	Nunavut Tunngavik Inc.
IR Number:	NTI-4
IR Directed To:	West Kitikmeot Resources Corp.
Subject:	Potential Impact of RFI Road Network on Caribou Movement
Reference:	Volume 4, Attachment 9A3, figure 9A3.3C; Volume 6, p. 16-67 (Figure 16.6), p. 16-139; Volume 10, p. 32-11.
Issue/Concern:	The IS acknowledges that the combination of the north-south Grays Bay and Izok roads (west of Contwoyto Lake) and the east-west Hackett/Back River road (east of Contwoyto Lake) may pose an issue for Bathurst caribou. Should simultaneous activity on all roads "create a continuous filter to movement", then "all BCH caribou are likely to experience local movement effects (e.g., avoidance, crossing delays, changes in activity) that could alter the timing of migration and the location of calving" (Volume 6, p. 16-139). The above excerpt alludes to cumulative effects that are seemingly of significance.
Information Requests:	1) Provide modelling of permeability, crossing probability, migration delay, migration route alteration, calving area displacement and barrier effects in a future scenario with all RFI roads active; and 2) Provide traffic sensitivity analyses for RFI development scenarios.

IR Source:	Nunavut Tunngavik Inc.
IR Number:	NTI-5
IR Directed To:	West Kitikmeot Resources Corp.
Subject:	Cumulative Exposure of Caribou to Disturbance
Reference:	Volume 1, p. MD-57; Volume 6, p. VS.6-9, p. VS.6-11, pp. 16-105-106, p. 16-159; Volume 6, Appendix 16B, p. 2, p. 35, p. 37.
Issue/Concern:	The IS notes the likelihood that Bathurst caribou will experience a 4.3-day net increase their annual exposure to disturbance due to Project and RFI activities. This compares to a 1.5-day net increase due to the Project alone, which is expected to be moderate in magnitude and lead to both local and broader movement alterations. Exposures to disturbance will mainly occur during the herd's spring migration and are expected to overlap with its central migration corridor and migration pinch points.
Information Requests:	1) Determine how using a 5 km ZOI as the basis for defining exposure, as was done in the Vulnerability Assessment (Appendix 16B), would affect the IS' calculation of cumulative caribou exposure to disturbance; 2) Clarify whether caribou behavioural responses (e.g., road paralleling, deflection) are included in exposure time calculations; 3) Clarify if the potential effect of varying traffic intensity on caribou road crossing behaviour and delay has been accounted for in exposure time calculations; 4) Explain the effect of increasing traffic on exposure duration, crossing time and success, paralleling and deflection, avoidance and cumulative effects; and 5) Identify significance thresholds for cumulative exposure.

IR Source:	Nunavut Tunngavik Inc.
IR Number:	NTI-6
IR Directed To:	West Kitikmeot Resources Corp.
Subject:	Cumulative Effects: Caribou Assessment Area Boundaries
Reference:	Volume 1, p. MD-54; Volume 6, p. 16-61; Volume 6, Appendix 16A, p. 71; Volume 6, Appendix 16B, pp. 18-23.
Issue/Concern:	In relation to Project-related and cumulative effects, the primary assessment boundaries for mainland caribou encompass the portion of the Bathurst caribou range within Nunavut, rather than the herd's entire range, even though "distribution is a key component of assessing the Grays Bay Road" (Volume 6, Appendix 16B, p. 18). This is particularly true for Bathurst caribou, given that the herd's drastic decline has resulted in range shifts and contraction. While focusing on Nunavut may seem sensible, cutting off at the territorial border effectively impedes the assessment of potential effects on caribou migration, as all seasonal ranges overlap to at least some extent with Project and RFI roads. During a recent workshop on the Mary River Cumulative Effects Assessment Framework (CEAF), emphasis was placed on the need to expand the geographic scope of cumulative effects assessments to include the entire range of migratory wildlife species harvested by Nunavut Inuit.
Information Requests:	1) Assess the implications of excluding a portion of the annual range of Bathurst caribou with respect to the assessment of cumulative effects on the herd's migration and distribution; 2) Provide an analysis of cumulative effects on Bathurst caribou using the herd's full annual range; and 3) Explain the interaction between cumulative effects occurring outside of Nunavut and Project effects on Bathurst caribou.

IR Source:	Nunavut Tunngavik Inc.
IR Number:	NTI-7
IR Directed To:	West Kitikmeot Resources Corp.
Subject:	Bathurst Caribou Herd as a Proxy for Mainland Caribou
Reference:	Volume 6, p. 16-1, pp. 16-84-85, p. 16-157; Volume 6, Appendix 16A, p. 15, pp. 127-128; Volume 6, Appendix 16B, p. 3, p. 15, pp. 23-24.
Issue/Concern:	The IS focuses on Bathurst caribou because it suggests that the other mainland herds' infrequent interactions with the Project tend to mirror those of the Bathurst herd in range use and movements. While the ranges of the Beverly and Ahiak herds minimally overlap with the Project, Inuit observations and collaring data alike point to considerable interactions between Bathurst, Beverly, Ahiak, and Dolphin and Union caribou during migrations and overwintering. Considering the Bathurst herd's drastic 98% decline between 1986 (over 470,000 caribou) and 2018 (less than 7,000 caribou), and the reported emigration of thousands of Bathurst caribou to the Beverly and Ahiak herds between 2011 and 2023, it is not inconceivable that the behaviour of Beverly, Ahiak, and Dolphin and Union caribou may be, or become, more representative of Bathurst caribou range use and migratory movements than the reverse.
Information Requests:	1) Explain in greater detail why separate assessments for the Beverly, Ahiak, and Dolphin and Union herds are not contained in the IS; 2) Provide evidence that Bathurst caribou range use, movements and Project-related responses represent those of the Beverly, Ahiak, and Dolphin and Union herds, respectively; 3) Provide analyses of range, migration, exposure overlap and vulnerability for the Beverly, Ahiak, and Dolphin and Union herds; and 4) Provide the results of any other herd-specific assessments.

IR Source:	Nunavut Tunngavik Inc.
IR Number:	NTI-8
IR Directed To:	West Kitikmeot Resources Corp.
Subject:	Cumulative Effects Mitigation and Monitoring
Reference:	Volume 1, pp. ES-20-21, pp. ES-26-27, p. ES-31, pp. MD-24-25, pp. MD-56-58, p. MD-85, p. MD-92, p. MD-95; Volume 2, p. 2-53; Volume 3, p. 6-18; Volume 5, p. 11-52; Volume 6, p. VS.6-9, pp. 16-31-32, p. 16-94, p. 16-104, p.16-125, p. 16-142; Volume 9, p. VS.9-10, p. 24-118; Volume 10, pp. 32-5-6; Volume 11, Appendix 37A, pp. 17-18; Volume 11, Appendix 37B, p. 8, pp. 11-12, p. 15, p. 26, p. 28.
Issue/Concern:	A suite of plans (e.g., Wildlife Mitigation and Monitoring Plan, Road Management Plan, Caribou Trigger Action Response Plan, Marine Mammal Monitoring Program, Air Quality Monitoring and Management Plan) are earmarked as key instruments in the minimization of Project effects. The notion that cumulative effects are expected to be minimized by the same mitigations as those proposed for the Project is similarly brought forward. For instance, the Road Management Plan will "help limit Project-related disturbance to wildlife by setting clear expectations for industrial traffic" (Volume 1, p. MD-95), and establish "control over development tied to the road" (Volume 2, p. 2-53). Also, the continued ability of caribou to move freely and cross roads is expected, "assuming these RFI projects implement mitigation, management, and enhancement measures similar to the Project's" (Volume 6, p. 16-142). Conversely, it is noted that "WKR is not responsible for other proponents, nor are these parties under WKR's care or control when using WKR-owned infrastructure", and that infrastructure users will be responsible "for assessing and managing the effects of their own activities" (Volume 10, p. 32-5). Considering that this array of monitoring plans is at the core of WKR's proposed cumulative effect mitigation strategy, clarity and certainty regarding the extent to which third-party infrastructure users will be bound by WKR plans are required.
Information Requests:	1) Identify which measures, if any, are only applicable to WKR (versus all infrastructure users); 2) Explain how infrastructure users will be bound to abide by mitigation and monitoring measures laid out in WRK plans, and describe related mechanisms through which

	third-party compliance will be achieved and enforced, if need be; and 3) Clarify whether cumulative effects conclusions were made under the assumption of total third-party infrastructure user compliance with WKR mitigation and monitoring plans.

IR Source:	Nunavut Tunngavik Inc.
IR Number:	NTI-9
IR Directed To:	Nunavut Impact Review Board
Subject:	Cumulative Effects Mitigation and Monitoring
Reference:	Volume 1, p. ES-21, p. ES-27, p. MD-57, p. MD-85; Volume 2, p. 2-53; Volume 6, p. 16-138; Volume 6, Appendix 16B, p. 47; Volume 10, pp. 32-5-6.
Issue/Concern:	It is expected that cumulative effects will be minimized through an expanded use of the Project-related mitigative measures. At the same time, WKR highlights that it is not responsible for third-party infrastructure users, emphasizing that these users will bear the responsibility for effects resulting from their own activities and for complying with their own operational mitigations and commitments. However, WKR also acknowledges that "some regional-level coordination among the Project and RFI physical activities is expected during key time periods, such as BCH spring migration, calving, and post-calving" (Volume 6, p. 16-138), and that "enhanced herd co-management is needed for herd recovery, which would increase the herd's resilience to the costs of the Grays Bay Road" (Volume 6, Appendix 16B, p. 47).
Information Requests:	1) Does the NIRB see itself playing a role in providing a framework for the assessment of cumulative effects from all GBRP-related activities?; and 2) Does the NIRB envision how monitoring may be apportioned between WKR and third-party infrastructure users to ensure a coordinated, gapless approach to the assessment of cumulative effects on wildlife from road and port use?

IR Source:	Nunavut Tunngavik Inc.
IR Number:	NTI-10
IR Directed To:	West Kitikmeot Resources Corp.
Subject:	Inuit Harvesting Access Permit System
Reference:	Volume 2, p. 2-2; Volume 6, p. 16-41, p. 16-111; Volume 9, p. VS.9-7; Volume 11, Appendix 37A, p. 10; Volume 11, Appendix 37B, p. 5.
Issue/Concern:	In order to minimize overharvesting, wastage and poaching risks, an access pre-approval and permitting system involving the KitIA and an unnamed Hunters and Trappers Organization (HTO) is envisioned; without which, use of the road for harvesting purposes would be prohibited. This controlled harvesting access is expected to align with the current tag system and TAH. It is unclear how the access protocols to be included in the Road Management Plan to prevent unintentional restrictions on Inuit merge with this harvesting access/permitting system. NTI emphasizes that the *Nunavut Agreement* grants Inuit free and unrestricted right of access for the purpose of harvesting (with exceptions), as well as the right to harvest without any form of licence, permit or imposed fee.
Information Requests:	1) Identify which HTO(s) are expected to participate in discussion with the KitIA regarding the access application and permit issuance processes; 2) Describe the current status of the discussions regarding the joint KitIA-HTO issuance of road access for harvesting permits; 3) Indicate how the access/permitting system might operate if consensus between the KitIA and the HTO(s) is not attained and/or if alignment with the tagging system and TAH is not achieved as expected; 4) Specify, in the event of a Bathurst caribou recovery, how an eventual TAH removal and the reopening of non-Inuit harvesting might affect the access/permitting system; and 5) Explain how the contemplated access and permitting system will not unduly burden the exercise of Inuit hunting rights.
IR Source:	Nunavut Tunngavik Inc.

IR Number:	NTI-11
IR Directed To:	West Kitikmeot Resources Corp.
Subject:	Consideration of Caribou Vulnerability Assessment
Reference:	Volume 1, p. NTS-7, p. ES-21; Volume 6, pp. 16-155-156, p. 16-158; Volume 6, Appendix 16B, pp. 2-3, p. 42, pp. 46-47.
Issue/Concern:	The IS concludes that, taking mitigation into account, Project-related residual effects as well as cumulative effects on Bathurst caribou are predicted to be not significant, even though the herd's vulnerability is presumably already high (since its 98% decline has yet to be followed by a recovery). Assuming low traffic and no hunting along the Project road, but excluding costs associated with any deflection from the road, the vulnerability assessment projects a 1.6% exponential decline of the Bathurst herd compared to no development, under current climate conditions. Factoring in the all-season upgrade of the TCWR in addition to the Project road potentially brings about a 3.6% annual decline in the Bathurst herd under current climate conditions, and a 12% under a future (i.e., warmer) climate scenario. Overall, the vulnerability assessment concludes that "development-related exposure from the GBRP and associated roads results in measurable impacts on caribou energetics and demographics, particularly for the Bathurst herd. Climate change introduces additional strain, and the combination of both factors significantly accelerates projected population decline. However, mitigation measures targeting traffic and hunting pressure have the potential to reduce those effects when applied consistently" (Volume 6, Appendix 16B, p. 3).
Information Requests:	1) Clarify how demonstratable impacts on Bathurst caribou energetics and demographics leading to an accelerated projected population decline—of an already severely declined herd—can be considered not significant; and 2) Provide an indication of how mitigation will be effective enough to offset projected negative demographic outcomes for Bathurst caribou under low traffic and no hunting conditions, but also under high traffic (exposure penalties doubled) and high traffic and active hunting (exposure penalties tripled).

IR Source:	Nunavut Tunngavik Inc.
IR Number:	NTI-12
IR Directed To:	West Kitikmeot Resources Corp.
Subject:	Alternative Road Alignment
Reference:	Volume 2, p. 2-12, Figure 2.2; Appendix 16B.
Issue/Concern:	Given the current low numbers of the Bathurst caribou herd and the further reduction in cow and calf weight that is expected to result from exposure to traffic on the Grays Bay road (see Appendix 16B), it is important to understand the trade-offs being made when deciding on whether an alternative road alignment is appropriate. Previous versions of the project have proposed a road alignment that would avoid Bathurst caribou calving grounds, however this alignment has been rejected for the current project on the grounds that it would result in "additional design and construction costs for the road and less desirable vehicle operation and safety considerations." Given the significance of the trade-off being proposed (construction costs verus increased effects on caribou), it is important to understand this trade-off in more detail.
Information Requests:	1) Provide a comparative chart which would allow readers to compare the technical details of the proposed road alignment and the rejected alternative, including distance, number of bridge crossings, road footprint, number and size of fill areas, and projected construction costs; 2) Provide updated version of the *Vulnerability assessment of the Bathurst, Beverly/Ahiak, and Dolphin and Union caribou herds to the proposed Grays Bay Road and Port Project* which carries out the same analysis for the alternative road alignment.

IR Source:	Nunavut Tunngavik Inc.
IR Number:	NTI-13
IR Directed To:	West Kitikmeot Resources Corp.
Subject:	Identification of Representative Species of Terrestrial Mammals
Reference:	Volume 6, p. 18-1
Issue/Concern:	The assessment of potential effects on other territorial wildlife contained in Part 18 relies on the use of "four indicator species selected to represent the Other Terrestrial Wildlife Valued Component (VC) for this effects assessment" (vol 6, p. 18-1). However, no justification is offered for why the four selected species should be considered "indicator species" or for why the anticipated effects on these species can be extrapolated out to other terrestrial mammal species whose lifecycles and use of the project area are dissimilar from that of the four indicator species.
Information Requests:	1) Provide reasoning and justification, based on Inuit, Indigenous, and Community Knowledge and scientific knowledge and data, for why these four species should be considered "indicator species". 2) Indicate any ways in which the indicator species may not be representative of the effects of the project on other terrestrial mammals. 3) Provide reasoning and justification, based on Inuit, Indigenous, and Community Knowledge and scientific knowledge and data, for why the effects of the project on other terrestrial mammal species, such as foxes, hares, and other small mammals, do not need to be studied but can rather be assumed to be minimal. 4) Provide reasoning and justification, based on Inuit, Indigenous, and Community Knowledge and scientific knowledge and data, for why the mitigation measures proposed to reduce the effects of the project on the four indicator species would apply to terrestrial mammal species whose use of the project area differs from that of the four indicator species.

IR Source:	Nunavut Tunngavik Inc.
IR Number:	NTI-14
IR Directed To:	West Kitikmeot Resources Corp.
Subject:	Design of Security Gates
Reference:	Volume 1, p. NTS-5, ES-5, MD-16, 20, 24, Volume 2, Table 2.10 (p. 2-33); Volume 11, Road Management Plan (Draft), p. 10
Issue/Concern:	The mitigation measures proposed by the proponent rely heavily on the fact that the road will be a "controlled access" road. This assumption, in turn, relies on the presumption that the gates at either end of the road will be effective at preventing unauthorized use of the road.
Information Requests:	1) Please provide details regarding the anticipated design and placement of the proposed gates. 2) Explain how the gates will prevent unauthorized access to the road, particularly by vehicles other than heavy trucks. 3) Explain what actions the promoter intends to take when unauthorized use of the road takes place.