

**Yellowknives Dene First Nation (YKDFN) Information Requests
West Kitikmeot Resources Corp. (the “Proponent”)
Grays Bay Road and Port Project (the “Project”)**

I. Caribou

IR Source:	YKDFN
IR Number:	YKDFN IR #1
IR Directed To:	West Kitikmeot Resources Corp.
Subject:	Failure to factor in the connection of the Grays Bay Road (the “GBR” or the “Road”) to an all-season road corridor in the Northwest Territories (the “NWT”)
Reference:	Grays Bay Road and Port Project Impact Statement, Volume 1: Main Document, p. MD-5 and MD-10; Volume 2: Introduction, Project Description and Alternatives, p. 2-10, 2-11
Issue/Concern:	<p>The proposed all-season road to Jericho Station is stated to link to the Tibbitt to Contwoyto Winter Road (TCWR) at Contwoyto Lake via a 3 km winter road.</p> <p>In the Main Document (p. MD-10) and Volume 2 (p. 1-22) it is stated that Canadian Sovereignty and Security (including supplying Canadian Naval and Coast Guard vessels at the Port) are project objectives. This would suggest connection via an all-season road to the southern Canadian road network. A linking all-season road is noted as a potential future development (Vol. 1 MD-13; Vol. 2 Section 2.3) once the NWT portion of an all-season road is in development.</p> <p>The federal strategy cited in Volume 2 (p. 1-22) is to construct an all-season road link between a port on the Arctic Ocean with all-season roads in southern Canada. The proposed GBR relies on winter roads from Jericho Station to Yellowknife for its link to the southern all-season road network. The current TCWR does not connect to the Nunavut border. Further, construction of the TCWR in the future is in doubt owing to closure of the</p>

	<p>Diavik Mine, financial difficulties at the Ekati Mine (currently under creditor protection), and declines in diamond values that may also affect the Gahcho Kue mine.</p> <p>As Canadian sovereignty and security are project objectives, then connection to a permanent all-season road through the NWT is not only reasonably foreseeable, it is necessary to achieve the Project objectives and benefits that are noted in the Impact Statement.</p>
Information Request:	Why do the cumulative effects of the GBR not explicitly consider the construction and operation of a connecting all-season road in the NWT?

IR Source:	YKDFN
IR Number:	YKDFN IR #2
IR Directed To:	West Kitikmeot Resources Corp., Kitikmeot Inuit Association (KIA)
Subject:	Controlled access
Reference:	Grays Bay Road and Port Project Impact Statement, Volume 11: Management Plans, Appendix 37A Road Management Plan, Section 5.1.1 Access to Management, p. 10; Volume 6: Terrestrial Environment, 16.4.3.2 Project Effects Pathways, p. 16-101-103
Issue/Concern:	The GBR is stated to be a private road (RMP, p.1). RMP Section 5.1.1 indicates that there will be controlled access on the GBR. Community users are to have free access to the GBR while access for hunting will require permits from the KIA and Hunters and Trappers Association. As hunting may affect caribou behaviour (Volume 6, Section 16.4.3.2), knowledge of locations where hunting occurs may be important to understand caribou movements.
Information Request:	a) Will the road be patrolled for adherence to speed limits and the adherence to wildlife protection measures (RMP, Section 6), especially giving of right-of-way to wildlife?

	<p>b) Beyond requiring the presentation of a permit for hunting at a controlled access point, will there be monitoring of locations and timing of hunting activities and other off-road use where the GBR provided the initial point of access?</p> <p>c) If the Proponent does not monitor harvest directly, can it conclusively state that indirect Project-related mortality of caribou is not significant?</p> <p>d) How effective will a gate be against access to the GBR via snowmachine or quad?</p> <p>e) Will access controls change when the GBR is connected to an all-season road in the NWT or other roads?</p>
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IR Source:	YKDFN
IR Number:	YKDFN IR #3
IR Directed To:	West Kitikmeot Resources Corp.
Subject:	Ice breaking and migration of Dolphin and Union Herd (DUH) caribou. Potential changes in harvesting of Bathurst Caribou Herd (BCH) and DUH caribou and herd persistence.
Reference:	Grays Bay Road and Port Project Impact Statement, Volume 1: Main Document, p. ES-30; Volume 2: Introduction, Project Description and Alternatives, 1.6.1.2 Security Benefits, p. 1-22; Volume 6: Terrestrial Environment, p. 16-33
Issue/Concern:	The Proponent states that: “No icebreaking will occur during normal port operations during the Construction or Operations and Maintenance phases of the Project. The port will only receive vessels during the open-water season, which is typically from late June through October, and as such, is not expected to alter DUH caribou migration paths” (p. ES-30).

	<p>The Proponent further states that: “Icebreaking will not occur during DUH migrations. Currently, the Canadian Coast Guard is the only entity authorized to break fast ice and may do so only in specific situations, including emergencies. Future third party activities, such as icebreaking, which may impede DUH migrations across the Coronation Gulf, are not associated with the Project. Any such activity facilitated by the Project will not affect DUH migrations, as the Project Port will be operational only for shipping during the open-water season (typically from late June through October)” (p. 16-33).</p>
<p>Information Request:</p>	<p>a) What future third party activities are contemplated in the quote above with respect to icebreaking?</p> <p>b) How has the proponent addressed in the effects assessment for the Project the potential for the Government of Canada to undertake/ increase icebreaking activities for reasons of commerce or sovereignty and security as being reasonably foreseeable?</p> <p>Even if we accept that the Proponent is not responsible for icebreaking by other parties, the fact remains that it is a reasonably foreseeable activity that must be addressed in a cumulative effects assessment for its effects on the DUH. Loss of ice for migration due to icebreaking will add to or increase the vulnerability of DUH migration noted by the Proponent in section 16.4.7.3.</p> <p>c) What temporal and spatial extent of icebreaking does the Proponent consider a threshold that would disrupt migration of the DUH caribou?</p> <p>d) If the DUH migration is disrupted, what are the potential implications for changes in mainland caribou harvest and what are the expected effects on the persistence of both DUH and BCH populations?</p> <p>e) What protections can the Proponent provide against shifting harvest between caribou herds?</p>

IR Source:	YKDFN
IR Number:	YKDFN IR #4
IR Directed To:	West Kitikmeot Resources Corp., Government of Nunavut (GN), and Government of the Northwest Territories (GNWT), Mackenzie Valley Environmental Impact Review Board (MVEIRB)
Subject:	Restriction of cumulative effects assessment on BCH to area in Nunavut. Reasonably foreseeable and reasonably foreseeable induced projects outside Nunavut (i.e., Assessment Area 1 of the Bathurst Caribou Range Plan) are ignored in cumulative effects assessment.
Reference:	Guidelines for the preparation of an impact statement for West Kitikmeot Resources Corp’s Grays Bay Road and Port Proposal (January 30, 2026) Grays Bay Road and Port Project Impact Statement, Volume 2: Introduction, Project Description and Alternatives, 1.6.1.2; Volume 6: Terrestrial Environment, 16.5 Assessment of Cumulative Effects on Caribou, 16.6 Transboundary Effects on Caribou
Issue/Concern:	NIRB’s guidelines for the Impact Statement (p. 32) state that: “The Impact Statement shall define the spatial boundaries of the maximum area potentially affected by the proposed project and the alternative means to undertake the project, based on the boundaries for each individual type of impact...” The guidelines explicitly state (p. 32) that “...potential ecosystemic or socio-economic impacts outside of Nunavut” are to be considered. The guidelines later (p. 52) indicate that transboundary impacts “should be considered for all valued components identified by the Proponent, with specific consideration given to the potential for transboundary impacts associated with...the large migration range of land mammals such as caribou.”

	<p>The BCH is a transboundary herd with the majority of its range in the NWT and the critical calving, post-calving, and summer ranges occurring mostly in Nunavut.</p> <p>The GBR will foreseeably be linked to an all-season road connecting it with the NWT highway network (and in the meantime be connected by the TCWR). Volume 2, Section 1.6.1.2, p. 1-22 notes that the two roads together “will complete an Arctic Economic and Security Corridor... a nation building corridor.”</p> <p>Together, the two roads will likely run through the calving, post-calving, summer, fall, and winter ranges of the BCH. To ignore the effect of one of the roads owing to a territorial boundary circumvents the express purpose of a cumulative effects assessment. The two roads are jointly discussed in Volume 2, Section 1.6 as contributing to the GBR’s purpose and need.</p> <p>The Impact Statement’s cumulative effects assessment for the BCH confined the effects assessment to the area within Nunavut (BCRP-RAA1). Consequently, by excluding effects on the BCH range and animals in the NWT, the cumulative effects were underestimated, likely by a significant amount.</p> <p>The Impact Statement’s transboundary effects assessment does not account for additional effects of the factors considered for Project effects. Transboundary effects did not contribute to the determination of the significance of the Project’s effects on the BCH.</p> <p>Of particular concern are the excluded cumulative effects on movement and herd vulnerability for the BCH.</p>
<p>Information Request:</p>	<p>a) For the Proponent, what are the cumulative effects of the Project and reasonably foreseeable developments on the BCH when assessed over the entire range of the BCH?</p> <p>b) For the Proponent, please compare them with the cumulative effects estimated previously for BCRP-RAA1.</p>

	c) For the GN, GNWT and MVEIRB, please provide any information with respect to the cumulative effects on the entire range of the BCH.
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IR Source:	YKDFN
IR Number:	YKDFN IR #5
IR Directed To:	West Kitikmeot Resources Corp., KIA
Subject:	Hunting permitted via access to GBR
Reference:	Grays Bay Road and Port Project Impact Statement, Volume 1: Main Document, MD.6.3.2, Project Effects, pp. MD-55, MD-56, MD-57
Issue/Concern:	<p>Access from the GBR for hunting BCH and DUH. Clarification sought.</p> <p>Impact Statement, Volume 1, Section MD.6.3.2 states that:</p> <ul style="list-style-type: none"> • Hunting is classified as an indirect cause of caribou mortality. • Controlled access for hunting and facilitated predator management will address indirect mortality risk effects. • The total additional annual mortalities from indirect effects of the Project are expected to range between 1-5 for the DUH and 1-7 for the BCH. <p>Taken together, this indicates that hunter access will be controlled such that no more than 5 DUH and 7 BCH caribou are harvested annually by hunters using the GBR to access hunting areas.</p>
Information Request:	a) Will the Proponent have a role in monitoring hunter harvest, or will they be limited to checking for permits at access control points?

	b) What is the extent of the current monitoring for hunter harvest in the Project area and who is responsible for that monitoring?
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IR Source:	YKDFN
IR Number:	YKDFN IR #6
IR Directed To:	West Kitikmeot Resources Corp.
Subject:	Range Disturbance Assessment for BCH
Reference:	Grays Bay Road and Port Project Impact Statement, Volume 6: Terrestrial Environment, 16.4.1.1 Analytical Assessment Techniques, p. 16-86
Issue/Concern:	<p>The Impact Statement reports on proportional disturbance of Assessment Area 1 as defined in the Bathurst Caribou Range Plan (BCRP-AA1). As noted in the Impact Statement, the BCH is a transboundary caribou population with seasonal ranges in both Nunavut and NWT. BCRP-AA1 is defined as the portion of the Bathurst range that is in Nunavut.</p> <p>The effects of the Project on the BCH and their habitat will likely extend beyond BCRP-AA1, particularly when you factor in cumulative effects.</p>
Information Request:	a) What are the effects, including direct effects, cumulative effects and transboundary effects, on range disturbance and the BCH in BCRP-AA2 (the portion of the Bathurst range in the adjacent area in the NWT)?

IR Source:	YKDFN
IR Number:	YKDFN IR #7
IR Directed To:	West Kitikmeot Resources Corp.
Subject:	Barrier effect of GBR and TCWR to caribou movement
Reference:	Grays Bay Road and Port Project Impact Statement, Volume 6: Terrestrial Environment, p. 16-47, Appendix 16A, section 4.1.2.2, p. 30; Volume 11: Management Plans, Appendix 37B - Wildlife Mitigation and Monitoring Plan (WMMP)
Issue/Concern:	<p>YKDFN is concerned about the barrier effect of the Project on the BCH and interruption of their movement and migration.</p> <p>The Impact Statement includes:</p> <ul style="list-style-type: none"> - an assessment of migration pathways across the proposed GBR corridor with Brownian Bridge Movement Models (Appendix 16A, s. 4.1.2.2) derived from radio-collared caribou and active on-the-ground monitoring (WMMP, s. 8.2.2.4) - a commitment to adaptive mitigation strategies (WMMP and Trigger Action Response Plan) <p>The barrier effect is of continuing concern as caribou are known to avoid anthropogenic disturbance.</p>
Information Request:	<p>a) What studies has the Proponent undertaken with respect to the barrier effect of the GBR and any mitigations?</p> <p>b) How would the effects assessment for the Project change if the BCH alters its movements to avoid the road?</p> <p>c) Will the Proponent commit to undertaking a study and analyzing any factors (traffic and road characteristics etc.) that reduce the barrier effect for caribou?</p>

IR Number:	YKDFN IR #8
IR Directed To:	West Kitikmeot Resources Corp.
Subject:	Ability of monitoring program to detect caribou approaching the road and extent of daily road surveys by Project environmental monitoring staff.
Reference:	Grays Bay Road and Port Project Impact Statement, Volume 11: Management Plans, Appendix 37B – WMMP, especially Sections 8.2 and 8.3
Issue/Concern:	<p>The Proponent has described three main methods of detecting caribou as they approach the GBR (Volume 11, Appendix 37B (WMMP) Section 8.2.1). The first is radio-collared caribou location data to be provided by the Government of Nunavut and the Government of the Northwest Territories, primarily in key seasons for each of the BCH and DUH. The second is on-the-ground active monitoring by environmental monitors who will rely on line-of-sight monitoring. Finally, incidental observations by project personnel and third-party users of the road will be recorded.</p> <p>When caribou are first approaching the road in their migratory seasons, radio-collar data can provide advance notice of migrating animals when they are still several days away. Once the migration has begun, scheduled on-the-ground active monitoring by environmental monitors will be needed to monitor distribution and abundance and its changes over time. Dedicated daily monitoring (Section 8.3.3) is the key method to detect groups that trigger events under the caribou TARP (i.e., 25 or more animals, or cows with calves). Radio-collars will have a low probability of detection for groups as small as 25 animals (e.g., if 2% of adult females have a collar, then there will be only a 40% probability that at least one animal in a group of 25 has a collar on it). Instead, their detection will require direct observation.</p>
Information Request:	a) Please define the geographic extent of the Proponent’s daily caribou monitoring.

	<p>b) Will the Proponent commit to daily surveys by environmental monitors on the full extent of the GBR?</p> <p>c) Will the Proponent conduct daily road surveys to document hunter success and harvest locations?</p>
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IR Source:	YKDFN
IR Number:	YKDFN IR #9
IR Directed To:	West Kitikmeot Resources Corp.
Subject:	Calculation of seasonal ranges from BCH radio collar data
Reference:	Grays Bay Road and Port Project Impact Statement, Volume 6: Terrestrial Environment, p. 16-60 – 16-63, Appendix 16A, p. 27
Issue/Concern:	<p>It is not clear in the Impact Statement how telemetry location data were used to represent seasonal ranges.</p> <p>The Impact Statement notes that data were screened to only include locations from animals that generated data on at least half the days in the season.</p> <p>Data collection frequency over 30 years varied from one location per animal for each 5-day period to multiple locations per day per animal. Depending on methods used, this can weight some years and animals significantly more than others, especially years from 2015 onwards when all collars were set to acquire at least three locations every day.</p>
Information Request:	<p>There are several questions important to understanding the analyses.</p> <p>a) Are the data from female caribou only? No mention is made in the methods descriptions or on the figures.</p>

	<p>b) Was a separate 95% utilization distribution created for each season in each year and the seasonal 95% utilization distribution merged to create a multi-year seasonal range for Figure 16.2? Or were all data from a season pooled, irrespective of year, before a single utilization distribution for each season was calculated to represent use in all years together?</p> <p>c) Were all available data used for all animals included in analyses (i.e., every location from each animal-season that was screened into the data set)?</p> <p>d) Please provide a year-by-season table showing numbers of animals and numbers of locations included in seasonal range utilization distribution analyses. Table A.1 in Appendix A of Volume 6, Appendix 16A shows the numbers of collared animals from each year used for Resource Selection Function analyses – a similar Table with total number of locations (in parentheses) beside the number of animals for each season in each year is what is being requested.</p> <p>e) If all data from all years were pooled together before analyses to produce a single seasonal 95% utilization distribution, please discuss the implications and limitations of the results. Please also comment on an alternative analytical method similar to the method used in the report to map peak calving areas – overlaying a separately calculated range from each year to give equal weight to each year, capturing inter-annual variability and areas used in early years of radio-collar data collection.</p>
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IR Source:	YKDFN
IR Number:	YKDFN IR #10
IR Directed To:	West Kitikmeot Resources Corp.
Subject:	Resource selection functions analyses data
Reference:	Grays Bay Road and Port Project Impact Statement, Volume 6: Terrestrial Environment, Appendix 16A, Appendix A – Habitat Modelling – Resource Selection Functions, Tables A.1 and A.2, pp. A-3 – A-4
Issue/Concern:	The summary rows at the bottom of the tables do not add up. The total numbers of GPS collars shown for each year do not equal the summary row showing the total number of caribou in all years. The total number of GPS locations in a season divided by the total number of caribou yields a number of locations per animal that is outside the range presented in the final row of the Table.
Information Request:	a) Please correct or explain discrepancies.

IR Source:	YKDFN
IR Number:	YKDFN IR #11
IR Directed To:	West Kitikmeot Resources Corp., GN, KIA
Subject:	Restrictions on access for hunting
Reference:	Grays Bay Road and Port Project Impact Statement, Volume 11: Management Plans, Appendix 37A, Road Management Plan; Volume 6; Volume 6: Terrestrial Environment, Appendix 16A, section 4.1.2.1, Seasonal Range Determination

<p>Issue/Concern:</p>	<p>The Total Allowable Harvest (TAH) for the BCH is 10 bulls per year in Nunavut. Bulls are mostly separated from females for calving/post calving.</p> <p>From BCH seasonal ranges calculated for other projects, it is likely that analyses will show that male BCH seasonal ranges are largely confined to areas west of the proposed GBR. Only male Bathurst caribou are to be harvested under TAH, and if males are largely restricted to areas west of the GBR, then restricting hunter access to areas west of the GBR may result in fewer disturbances affecting female caribou and the peak calving areas that are east of the road.</p> <p>Assumed: Seasonal BCH ranges presented in the report are from location data for female caribou only (but see YKDFN IR#9).</p>
<p>Information Request:</p>	<ul style="list-style-type: none"> a) For the Proponent, please provide seasonal range maps from analyses of male BCH data. b) For the Proponent, GN and KIA, please comment on the merit of restricting hunter access to areas west of the GBR. c) For the Proponent, will the Proponent work with other parties to further limit access for hunting to ranges primarily containing male caribou (thereby reducing disturbances on females and calves)?

IR Source:	YKDFN
IR Number:	YKDFN IR #12
IR Directed To:	West Kitikmeot Resources Corp.
Subject:	RSF interpretation
Reference:	Grays Bay Road and Port Project Impact Statement, Volume 6: Terrestrial Environment, Appendix 16A, Appendix A of Terrestrial Wildlife Baseline Report
Issue/Concern:	Interpretation of selection ratios of habitat ratings presented in Figures on pp. A-12 (BCH calving), A-15 (BCH-summer), A-18 (BCH-fall), A21 (DUH – migration, and A-24 (DUH – winter).
Information Request:	<p>a) Are the habitat ratios to be interpreted as the relative strength of selection of habitat in each of those categories for that season? Please explain.</p> <p>b) For example, the Selection Ratio for High quality habitat in the Bathurst herd is presented as (interpreting from graphs): approximately 0.8 for calving season, 1.9 for summer, and 1.5 for fall. Can we interpret this as a presented stronger preference for the best habitat in summer than in the other seasons, and a weaker selection of habitat (suggesting more equivalent value across habitat categories) in calving?</p>

IR Source:	YKDFN
IR Number:	YKDFN IR #13
IR Directed To:	West Kitikmeot Resources Corp.
Subject:	Intersection of migration corridor with GBR
Reference:	Grays Bay Road and Port Project Impact Statement, Volume 6: Terrestrial Environment, section 16.4.3.4, pp. 16-105 – 16-107. See also YKDFN IR#8
Issue/Concern:	<p>The intersection of the migration corridor identified through brownian bridge movement models 95% utilization distribution with the GBR is presented as a 18.3 km segment within a 128.9 km stretch of road. This is filtered to explain that a high probability of intersection of the migration corridor occupies a much smaller part of the road than the full extent containing crossings.</p> <p>However, the brownian bridge movement model analysis combines data from multiple years, which have not been assessed for inter-annual variability, or for correlation with environmental covariates that may explain why animals use paths in some years but not others.</p> <p>The precautionary approach would be to assume that the spring migration corridor may reasonably be expected to cross the road anywhere in the area identified by brownian bridge movement model analyses (and perhaps other areas within the 129 km stretch). Furthermore, brownian bridge movement model analyses include data from an entire season, and migration may be advanced or delayed based on conditions in a given year, irrespective of median values in Table 4-6 of Appendix 16A.</p>
Information Request:	<p>a) Will caribou monitoring occur for the full length of the GBR?</p> <p>b) To facilitate future mitigation strategies, will the field monitoring include an assessment of road design (e.g., slope, material, orientation) at areas where caribou are present and where crossing does and does not occur?</p>

IR Source:	YKDFN
IR Number:	YKDFN IR #14
IR Directed To:	West Kitikmeot Resources Corp.
Subject:	Traffic patterns from 2035 onwards
Reference:	Grays Bay Road and Port Project Impact Statement, Volume 6: Terrestrial Environment, section 16.2.2.4, pp. 16-60 – 16-67 (Bathurst Caribou Calving Range)
Issue/Concern:	<p>Seasonal use of GBR prior to development of roads to NWT, Izok, and Hackett/Back River.</p> <p>The GBR is designed to connect to the TCWR at Contwoyto Lake. Until an all-season connection to NWT is constructed, travel south of Jericho will only be possible during the TCWR operating season.</p>
Information Request:	<p>a) Will there be a period of operation of the GBR when the only destination will be the TCWR?</p> <p>b) If so, during this time, will the GBR be closed seasonally in the BCH calving peak range, as there will be no other destination for vehicles? If not, please explain why not.</p>

IR Source:	YKDFN
IR Number:	YKDFN IR #15
IR Directed To:	West Kitikmeot Resources Corp.
Subject:	Traffic monitoring

<p>Reference:</p>	<p>Grays Bay Road and Port Project Impact Statement, Volume 11: Management Plans, Appendix 37A, 37B; Volume 2: Introduction, Project Description and Alternatives, p. 2-53</p>
<p>Issue/Concern:</p>	<p>In Volume 2 (p. 2-53) “Road traffic monitoring” is listed as being part of road operations. However, there is no program listed to monitor traffic on the GBR other than access control at either end of the road.</p> <p>Traffic levels are mentioned in Volume 11:</p> <ul style="list-style-type: none"> - Appendix 37A, Section 5.2.1.1 in relation to dust suppression; and - Appendix 37H, Section 5 in relation to traffic volume. <p>However, there is no traffic monitoring proposed among the plans in Volume 11.</p> <p>Experiences at other northern projects (e.g., Ekati Diamond Mine, Meliadine Gold Mine, Meadowbank Gold Mine) have identified traffic data as an important variable to be used in examining wildlife (especially caribou) behaviour when they encounter roads. Traffic data will be important information for the assessment of effects of the Project on wildlife movement and migration.</p> <p>The spatial and temporal resolution of the location data should be considered relative to the wildlife questions of concern.</p>
<p>Information Request:</p>	<p>a) Please provide a traffic monitoring program for the Project.</p> <p>b) Please indicate the methodologies proposed to be used by the Proponent to track vehicle traffic.</p> <p>c) Please indicate whether the Proponent will provide:</p> <ul style="list-style-type: none"> i. GPS tracking for vehicles on the GBR; ii. permanent vehicle transponders on Project vehicles (and possibly temporary transponders provided to non-Project vehicles at access control points); and iii. dedicated cameras along the GBR.

	If the Proponent will not provide any of the above, please indicate why not.
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IR Source:	YKDFN
IR Number:	YKDFN IR #16
IR Directed To:	West Kitikmeot Resources Corp.
Subject:	Caribou Resource Selection Function (RSF) analyses and interpretation
Reference:	Grays Bay Road and Port Project Impact Statement, Volume 6: Terrestrial Environment, Appendix 16A, Appendix A – Habitat Modelling – Resource Selection Functions, p. A-2
Issue/Concern:	<p>Orders of resource selection.</p> <p>The Impact Statement presents the RSF analyses as second-order selection. However, the analyses presented are third-order selection; i.e., the daily (or shorter time period – it is not clear) selection of locations from within a previously selected seasonal range. The restriction to selection within the seasonal range is clear from the description of screening criteria (to include used locations from animals found within the seasonal range) and the generation of random locations restricted to the area within that range.</p> <p>The issue is not with the analyses conducted, but with the absence of a consideration for the importance of the seasonal ranges selected by animals from the entire range used by the population (i.e., the actual second-order selection). For the Bathurst herd, the high level of fidelity of animals to specific seasonal ranges within the Project area (and the area that includes reasonably foreseeable and reasonably foreseeable induced developments) reveals the level of importance of those ranges to the persistence of the population. Any Project or cumulative depletion of those ranges, whether or not a specific habitat unit is selected at the third-order, may be critical to the herd.</p>

Information Request:	<p>a) Please conduct an examination of the level of inter-annual fidelity to each seasonal range and an assessment of the effects of the Project, including cumulative effects, on the direct and indirect loss of total seasonal range areas.</p> <p>b) From the results, please explain the importance of the seasonal ranges being used. The importance of any loss of seasonal range to the Project and cumulative effects relates to the herd and its entire range, not only to the portions within BCRP-RAA1.</p>
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IR Source:	YKDFN
IR Number:	YKDFN IR #17
IR Directed To:	West Kitikmeot Resources Corp.GN, GNWT
Subject:	Bathurst caribou population dynamics and population decline
Reference:	Grays Bay Road and Port Project Impact Statement, Volume 6: Terrestrial Environment, Table 16-7, p.16-31, Appendix 16B
Issue/Concern:	YKDFN is critically concerned with respect to the population decline of the BCH. The caribou vulnerability assessment (Appendix 16B) concludes that even with effective mitigation the cumulative effects may yield a 5.3% annual decline in the BCH.
Information Request:	a) Please provide population projections for the BCH that represent the possible outcomes with the Project and with the reasonably foreseeable and reasonably foreseeable induced developments.

IR Source:	YKDFN
IR Number:	YKDFN IR #18
IR Directed To:	West Kitikmeot Resources Corp.

Subject:	Mitigation of impacts to caribou
Reference:	Grays Bay Road and Port Project Impact Statement, Volume 6: Terrestrial Environment, VS.6.3.5 Mitigation, Management, and Enhancement Measures, p. VS.6-11, Volume 11: Management Plans, Appendix 37B Wildlife Mitigation and Monitoring Plan, p 1
Issue/Concern:	The Proponent has not identified caribou mitigation measures with certainty or precision. It is not possible to evaluate whether highest and best practices will be incorporated, or what the measures’ actual impact on caribou may be.
Information Request:	<p>The Proponent states that it “will implement a Wildlife Mitigation and Monitoring Plan (WMMP) that contains mitigation, management, and enhancement measures to reduce potential changes in caribou range disturbance, habitat, movement, and mortality risk.” (p. VS.6-11). Yet the Proponent’s version of the WMMP included at Appendix 37B is “presently not intended to provide detailed monitoring approaches and methods” (Appendix 37B p 1).</p> <ul style="list-style-type: none"> a) When, if ever, does the Proponent intend on providing a robust WMMP that includes detailed monitoring approaches and methods? b) Will the Proponent commit to providing a complete draft WMMP for review prior to a NIRB public hearing for the Project? c) Specifically, please provide details, including entities, timelines, and specific outcomes expected for the “continued discussions with governing bodies, working groups and other interested parties” the Proponent refers to as part of the process of developing “further details and monitoring design” (Appendix 37B p 1). d) Does the Proponent agree to the parties submitting further information requests once (a) has been done? If not, why not? If so, please propose a timeline for doing so and explain how this would fit into NIRB’s schedule.

	<p>e) Will there be a review panel or advisory body established to review the effectiveness of the WMMP over time? If not, why not? If so:</p> <ul style="list-style-type: none"> i) What role will Indigenous groups have on the review panel? ii) What decision-making powers will the review panel have to implement changes to the WMMP? To the extent that the review panel does not have decision-making power, why not?
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IR Source:	YKDFN
IR Number:	YKDFN IR #19
IR Directed To:	West Kitikmeot Resources Corp.
Subject:	Wildlife Mitigation and Monitoring Program effectiveness
Reference:	Grays Bay Road and Port Project Impact Statement, Volume 11: Management Plans, Appendix 37B Wildlife Mitigation and Monitoring Plan
Issue/Concern:	<p>Commitment to “...monitoring potential effects to inform wildlife mitigation during all phases...” (p. 1)</p> <p>The stated intent is to design a detailed WMMP by beginning with management, mitigation, and monitoring practices from existing projects approved in Nunavut.</p> <p>Irrespective of monitoring practices in place for other developments in Nunavut, for each element of a sampling program to be effective, it must be designed to detect a specific effect with a designed level of confidence and power. For each monitoring program element, there should be a designed level of ecological effect on measurable parameter(s) that it will detect over a given time and space.</p> <p>The quantitative details regarding effect size, power, confidence, sample size, and monitoring frequency and duration should appear as the objectives of each element of the monitoring program.</p>

Information Request:	As a detailed WMMP is created, will the Proponent commit to developing and documenting effective, quantitative designs for the monitoring program; linking each element to an environmental effect of concern and an ecologically important magnitude of that effect?
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IR Source:	YKDFN
IR Number:	YKDFN IR #20
IR Directed To:	West Kitikmeot Resources Corp.
Subject:	Mitigation of impacts to caribou
Reference:	Grays Bay Road and Port Project Impact Statement, Volume 6: Terrestrial Environment, VS.6.3.5 Mitigation, Management, and Enhancement Measures, p. VS.6-11
Issue/Concern:	The Proponent has not identified caribou mitigation measures with certainty or precision. It is not possible to evaluate whether highest and best practices will be incorporated, or what the measures' actual impact on caribou may be.
Information Request:	<p>The Proponent refers to a “caribou TARP [Trigger Action Response Plan].”</p> <ol style="list-style-type: none"> a) Has the Proponent developed a draft or final caribou TARP? If so, please provide the most recent version. If not, why has the Proponent not done this work? Please provide details on next steps and timelines for completing this work. b) Will the Proponent commit to providing a complete draft TARP for review prior to a NIRB public hearing for the Project? c) Does the Proponent agree to the parties submitting further information requests once (a) has been done? If not, why not? If so, please propose a timeline for doing

	<p>so and explain how this would fit into NIRB’s schedule.</p> <p>d) Will there be a review panel or advisory body established to review the effectiveness of the caribou TARP over time? If not, why not? If so:</p> <ul style="list-style-type: none"> i. What role will Indigenous groups have on the review panel? ii. What decision-making powers will the review panel have to implement changes to the caribou TARP? iii. To the extent that the review panel does not have decision-making power, why not?
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IR Source:	YKDFN
IR Number:	YKDFN IR #21
IR Directed To:	West Kitikmeot Resources Corp.
Subject:	Mitigation of impacts to caribou
Reference:	Grays Bay Road and Port Project Impact Statement, Volume 6: Terrestrial Environment, 16.1.1.6 Influence of Inuit, Indigenous, and Community Knowledge on the Development of Mitigation, Management and Enhancement Measures, p. 16-9
Issue/Concern:	The Proponent has not identified caribou mitigation measures with certainty or precision. It is not possible to evaluate whether highest and best practices will be incorporated, or what the measures’ actual impact on caribou may be.
Information Request:	The Proponent refers to “Mobile Caribou Conservation Measures (MCCMs)” to be included in its caribou TARP (Trigger Action Response Plan)

	<p>a) Has the Proponent developed a draft or final MCCM? If so, please provide the most recent version. If not, why has the Proponent not done this work?</p> <p>b) Please provide details on next steps and timelines for this work.</p> <p>c) Will the Proponent commit to providing a complete draft MCCM for review prior to a NIRB public hearing for the Project?</p> <p>d) Does the Proponent agree to the parties submitting further information requests once the above work has been done? If not, why not? If so, please propose a timeline for doing so and explain how this would fit into NIRB’s schedule.</p>
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IR Number:	YKDFN IR #22
IR Directed To:	West Kitikmeot Resources Corp.
Subject:	Further mitigation measures available for impacts to caribou
Reference:	Grays Bay Road and Port Project Impact Statement, Volume 6: Terrestrial Environment, VS.6.3.5 Mitigation, Management, and Enhancement Measures, p. VS.6-11; 16.5.2.2 Mitigation, Management, and Enhancement Measures for Cumulative Effects; 16.1.1.6 Influence of Inuit, Indigenous, and Community Knowledge on the Development of Mitigation, Management, and Enhancement Measures, p. 16-8
Issue/Concern:	YKDFN’s way of life is integrally connected to caribou, and in particular, the BCH. The BCH is considered threatened by the Committee on the Status of Endangered Wildlife in Canada (COSEWIC). In 2023, the Bathurst Caribou Advisory Committee determined the herd’s status to be “Critical Low”. The BCH population has continued to decline

	<p>precipitously, falling from 6,851 caribou in 2022 to 3,609 in 2025.¹ As a result, the Government of the Northwest Territories has placed a moratorium on all BCH hunting since 2015. Likewise, the Nunavut Government has placed a moratorium on all BCH cow and calf hunting, and restricted BCH bull hunting to 10 individuals per year.²</p> <p>Any further negative impacts to the BCH stand to significantly impact YKDFN’s Aboriginal rights and way of life. The Project, and its cumulative effects, stand to adversely impact BCH.³</p> <p>Yet the Proponent does not state that it has incorporated all highest and best practices possible to mitigate the Project’s impacts and cumulative effects on caribou.</p>
<p>Information Request:</p>	<p>Please list each measure (collectively, a “Measure”) that could improve mitigation of the Project’s impacts on caribou that the Proponent has committed to implement. For each, please explain:</p> <ul style="list-style-type: none"> a) What is the Measure? b) If the Measure were included in the Project, what are the possible improvements to mitigation of impacts to caribou, and specifically to the BCH? Please also identify the relevant categories of effect (i.e. range disturbance; habitat; movement; mortality risk; health)⁴. c) What studies have been undertaken on the effectiveness of the Measure on caribou and specifically the BCH? <p>Please answer the same questions with respect to the cumulative effects of the Project.</p>

¹ Grays Bay Road and Port Project Impact Statement (“PIS”), Vol. 6: Terrestrial Environment, 16.1.2 Regulatory and Policy Setting, p. 16-9 (citations omitted).

² PIS, Vol. 6: Terrestrial Environment, 16.4.6.1 Summary of Project Residual Effects on Caribou, Bathurst Caribou Herd, p. 16-115; 16.2.2.3 Harvest and Predation, p. 16-59.

³ PIS, Vol. 6: Terrestrial Environment, 16.1.6.4 Magnitude: Change in Mortality Risk, p. 16-24; 16.5.6.1 Bathurst Caribou Herd, p. 16-143.

⁴ PIS, Vol. 6: Terrestrial Environment, Table 16.14 Summary of Project Residual Effects on the Bathurst Caribou Herd, p. 16-116.

IR Source:	YKDFN
IR Number:	YKDFN IR #23
IR Directed To:	West Kitikmeot Resources Corp.
Subject:	Further mitigation measures available for impacts to caribou
Reference:	Grays Bay Road and Port Project Impact Statement, Volume 6: Terrestrial Environment, VS.6.3.5 Mitigation, Management, and Enhancement Measures, p. VS.6-11; 16.5.2.2 Mitigation, Management, and Enhancement Measures for Cumulative Effects; 16.1.1.6 Influence of Inuit, Indigenous, and Community Knowledge on the Development of Mitigation, Management, and Enhancement Measures, p. 16-8
Issue/Concern:	<p>YKDFN’s way of life is integrally connected to caribou, and in particular, the BCH. The BCH is considered threatened by the Committee on the Status of Endangered Wildlife in Canada (COSEWIC). In 2023, the Bathurst Caribou Advisory Committee determined the herd’s status to be “Critical Low”. The BCH population has continued to decline precipitously, falling from 6,851 caribou in 2022 to 3,609 in 2025.⁵ As a result, the Government of the Northwest Territories has placed a moratorium on all BCH hunting since 2015. Likewise, the Nunavut Government has placed a moratorium on all BCH cow and calf hunting, and restricted BCH bull hunting to 10 individuals per year.⁶</p> <p>Any further negative impacts to the BCH stand to significantly impact YKDFN’s Aboriginal rights and way of life. The Project, and its cumulative effects, stand to adversely impact BCH.⁷</p>

⁵ Grays Bay Road and Port Project Impact Statement (“PIS”), Vol. 6: Terrestrial Environment, 16.1.2 Regulatory and Policy Setting, p. 16-9 (citations omitted).

⁶ PIS, Vol. 6: Terrestrial Environment, 16.4.6.1 Summary of Project Residual Effects on Caribou, Bathurst Caribou Herd, p. 16-115; 16.2.2.3 Harvest and Predation, p. 16-59.

⁷ PIS, Vol. 6: Terrestrial Environment, 16.1.6.4 Magnitude: Change in Mortality Risk, p. 16-24; 16.5.6.1 Bathurst Caribou Herd, p. 16-143.

	Yet the Proponent does not state that it has incorporated all highest and best practices possible to mitigate the Project’s impacts and cumulative effects on caribou.
Information Request:	<p>Please list each measure, including but not limited to taking a more rigorous approach to a proposed measure (collectively, a “Measure”), that could improve mitigation of the Project’s impacts on caribou, but which the Proponent has <u>not</u> committed to implement. For each, please explain:</p> <ul style="list-style-type: none"> a) What is the Measure? b) If the Measure were included in the Project, what are the possible improvements to mitigation of impacts to caribou, and specifically to the BCH? Please also identify the relevant categories of effect (i.e. range disturbance; habitat; movement; mortality risk; health)⁸. c) Given the critical importance of caribou, and specifically the BCH, to YKDFN and other Indigenous peoples, why did the Proponent not include the Measure? d) What would be the approximate financial cost to the Proponent to include the Measure? <p>Please answer the same questions with respect to the cumulative effects of the Project.</p>

IR Source:	YKDFN
IR Number:	YKDFN IR #24
IR Directed To:	West Kitikmeot Resources Corp.

⁸ PIS, Vol. 6: Terrestrial Environment, Table 16.14 Summary of Project Residual Effects on the Bathurst Caribou Herd, p. 16-116.

<p>Subject:</p>	<p>Further mitigation measures available for impacts to caribou</p>
<p>Reference:</p>	<p>Grays Bay Road and Port Project Impact Statement, Volume 6: Terrestrial Environment, 16.1.6.6 Timing, p. 16-25; 16.1.1.5 Influence of Inuit, Indigenous, and Community Knowledge on Assessing Significance of Effects, p. 16-7; 16.4.6.1 Bathurst Caribou Herd, p. 16-118.</p>
<p>Issue/Concern:</p>	<p>See YKDFN IR #23.</p> <p>The Proponent states that:</p> <p style="padding-left: 40px;">The BCH will likely have frequent interactions with the Project during spring migration (April 20 to June 1), calving/post calving (June 2 to June 28), summer (June 29 to September 6), and fall (September 7 to November 30). Calving/ post-calving are critical periods associated with cow reproduction and calf survival. BCH interactions with the Project during summer, when caribou occupy areas at the southern end of the Project, occurs when calves are still vulnerable to predation and cows increase foraging to maintain sufficient body condition. (p. 16-25)</p> <p>As a result, the Proponent characterizes Project interactions during calving/post calving as “very high sensitivity”, and interactions during summer as “high sensitivity” (p. 16-25, emphasis added).</p> <p>The Proponent states that “[b]road-scale movement effects are expected during spring migration, which may influence central migration corridors and pinch points during a short window every year (~1 month)” (p. 16-118).</p> <p>IAG (Inuit Advisory Group) members advised the Proponent “to implement comprehensive measures and commitments that align with Inuit, Indigenous, and Community priorities and values”, including “implementing traffic restrictions/closures during sensitive seasons” (p. 16-7).</p>

Information Request:	<p>a) Please confirm that the Proponent has <u>not</u> committed to implementing annual closures of the GBR during either or both of the following times:</p> <ul style="list-style-type: none"> i. BCH calving/post calving (June 2 to June 28), a “critical period” of “very high sensitivity”; and, ii. summer (June 29 to September 6), a time of “high sensitivity”. <p>b) For each time listed above, does the Proponent agree that implementing annual GBR closures would reduce the number, frequency and impact of the interactions between the BCH and the Project? If not, why not?</p>
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IR Source:	YKDFN
IR Number:	YKDFN IR #25
IR Directed To:	West Kitikmeot Resources Corp.
Subject:	Further mitigation measures available for impacts to caribou
Reference:	Grays Bay Road and Port Project Impact Statement, Volume 6: Terrestrial Environment, 16.4.4.4 Project Residual Effect p. 16-112, 16.4.3.4 Project Residual Effect p. 16-105
Issue/Concern:	<p>See YKDFN IRs #23 and #24.</p> <p>The Proponent identifies a heightened risk of direct mortality to caribou “during periods of inclement weather and reduced visibility, especially at night” (p. 16-112).</p>
Information Request:	<p>a) Please confirm that the Proponent has <u>not</u> committed to the following additional measures:</p> <ul style="list-style-type: none"> i. GBR closures at night; ii. GBR closures during periods of inclement weather; iii. GBR closures during other periods of reduced visibility; iv. elevated standards for the above measures during the following times:

	<p>a. BCH calving/post calving (June 2 to June 28), a “critical period” of “very high sensitivity” (p. 16-25); and,</p> <p>b. summer (June 29 to September 6), a time of “high sensitivity” (p. 16-25).</p> <p>b) For each of the measures listed above, does the Proponent agree that implementing the measure could reduce the number of direct mortality or injury events to the BCH associated with the Project and/or reduce the combined Project effects of physical and perceptual filters on caribou movement? If not, why not?</p>
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IR Source:	YKDFN
IR Number:	YKDFN IR #26
IR Directed To:	West Kitikmeot Resources Corp.
Subject:	Further mitigation measures available for impacts to caribou
Reference:	Grays Bay Road and Port Project Impact Statement, Volume 6: Terrestrial Environment, 16.4.4.3 Mitigation, Management and Enhancement Measures, p. 16-110; 16.4.3.4 Project Residual Effect, p. 16-105; 16.1.1.6 Influence of Inuit, Indigenous, and Community Knowledge on the Development of Mitigation, Management, and Enhancement Measures, p. 16-8.
Issue/Concern:	<p>See YKDFN IRs #23 and 24</p> <p>Inuit, Indigenous and Community perspectives expressed the need for the following measures: temporary road closures during sensitive seasonal periods; using convoys to group vehicle movement; and real-time Inuit monitors (“boots on the ground”) to manage traffic during high-density caribou periods (p. 16-8).</p>
Information Request:	<p>a) Please confirm that the Proponent has <u>not</u> committed to the following additional measures to reduce the risk of direct caribou mortality events:</p> <p>i. Requiring vehicles to proceed by way of convoy;</p>

	<ul style="list-style-type: none"> ii. Monitoring and enforcing speed compliance by: checking driver time-in and time-off the GBR against expected; speed cameras; and/or intermittent arial (drone) surveillance; iii. Real-time Inuit or Indigenous <u>management</u> (not just monitoring) of traffic during high-density caribou periods, at key points along the GBR; iv. Caribou will have the right-of-way when they occur on, immediately adjacent to, <u>or within 100 m</u> of the GBR; v. With respect to caribou on or adjacent to the GBR that do not leave, vehicles must wait <u>60 minutes</u> before proceeding no faster than a walking pace; vi. Once past the caribou, <u>vehicles must proceed no faster than a walking pace for 100 m, and then no faster than 30 km/h until the caribou are no longer in sight</u>; vii. GBR construction activities will be suspended while <u>any</u> caribou individuals are within line of sight of the active work area, and will not recommence until caribou individuals are <u>no longer within line of sight</u> of the active work area; viii. Heightened restrictions for encounters with caribou calves and/or mother cows; and ix. Heightened restrictions during BCH calving/post calving (June 2 to June 28), a “critical period” of “very high sensitivity” (p. 16-25), and/or during summer (June 29 to September 6), a time of “high sensitivity” for BCH (p. 16-25). <p>b) For each of the measures listed above, does the Proponent agree that implementing the measure could reduce the number of direct mortality or injury events to the BCH associated with the Project and/or reduce the combined Project effects of physical and perceptual filters on caribou movement? If not, why not?</p>
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IR Source:	YKDFN
IR Number:	YKDFN IR #27

IR Directed To:	West Kitikmeot Resources Corp.
Subject:	Further mitigation measures available for impacts to caribou
Reference:	Grays Bay Road and Port Project Impact Statement, Volume 6: Terrestrial Environment, 16.4.4.3 Mitigation, Management and Enhancement Measures, p. 16-110; 16.4.3.4 Project Residual Effect p. 16-105; 16.1.6.6 Timing, p 16-25; 16.1.1.6 Influence of Inuit, Indigenous, and Community Knowledge on the Development of Mitigation, Management, and Enhancement Measures, p. 16-8.
Issue/Concern:	<p>See YKDFN IRs #23 and #24.</p> <p>It appears that the Proponent has not committed to all possible monitoring measures for caribou to assist in proactively knowing or predicting when caribou are likely to be on or near the GBR, reducing the Project’s adverse effect on caribou.</p> <p>Inuit, Indigenous and Community perspectives expressed the need for real-time Inuit monitors (“boots on the ground”) to manage traffic during high-density caribou periods (p. 16-8).</p>
Information Request:	<p>a) Please confirm that the Proponent has <u>not</u> committed to the following additional caribou monitoring measures to proactively predict when caribou are likely to be on or near the GBR:</p> <ul style="list-style-type: none"> i. radio collar monitoring; ii. motion-sensing cameras bordering either side of the GBR at a specified distance (e.g. 1 km); iii. Indigenous guardian monitoring; iv. intermittent drone surveillance v. heightened monitoring measures during BCH calving/post calving (June 2 to June 28), a “critical period” of “very high sensitivity” (p. 16-25), and/or during summer (June 29 to September 6), a time of “high sensitivity” for BCH (p. 16-25).

	<p>a) For each of the monitoring measures listed above, does the Proponent agree that implementing the measure could assist in knowing or predicting when caribou are likely to be on or near the GBR? If not, why not?</p> <p>b) Does the Proponent agree that knowing or predicting when caribou are likely to be on or near the GBR could, if combined with other mitigation measures (such as responsive road closures, etc):</p> <ul style="list-style-type: none"> i. reduce the number of direct mortality or injury events to the BCH associated with the Project; and/or ii. reduce the combined Project effects of physical and perceptual filters on caribou movement? <p>If not, why not?</p>
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IR Source:	YKDFN
IR Number:	YKDFN IR #28
IR Directed To:	West Kitikmeot Resources Corp.
Subject:	Impacts to caribou – vehicle collisions
Reference:	Grays Bay Road and Port Project Impact Statement, Volume 6: Terrestrial Environment, 16.4.4.4 Project Residual Effect, p. 16-112.
Issue/Concern:	<p>See YKDFN IR #23.</p> <p>The Proponent considers “direct mortality from caribou-vehicle collisions” but does not appear to account for the impact of non-fatal collisions.</p>
Information Request:	a) What short and long-term negative impacts can be caused by caribou-vehicle collisions that do not result in direct mortality? Please consider, without limitation: health, fecundity, lifespan, and learned aversion.

	b) For each answer above, please identify the basis for the answer and any references to support it. If there are no references, please confirm.
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IR Source:	YKDFN
IR Number:	YKDFN IR #29
IR Directed To:	West Kitikmeot Resources Corp.
Subject:	Caribou recovery
Reference:	Grays Bay Road and Port Project Impact Statement, Volume 6: Terrestrial Environment, 16.4.4.4 Project Residual Effect, p. 16-112.
Issue/Concern:	See YKDFN IR #23.
Information Request:	Please confirm that the Proponent has not committed to any action with the primary purpose of supporting the <u>recovery</u> of the BCH or DUH populations.

IR Source:	YKDFN
IR Number:	YKDFN IR #30
IR Directed To:	West Kitikmeot Resources Corp.
Subject:	Further mitigation measures available for cumulative effects on caribou
Reference:	Grays Bay Road and Port Project Impact Statement, Volume 6: Terrestrial Environment, 16.5.1 Project Residual Effects Likely to Interact Cumulatively with Residual Effects from Other Physical Activities, p. 16-125; 16.5.2.2 Mitigation, Management, and Enhancement Measures for Cumulative Effects, p. 16-131.
Issue/Concern:	<p>See YKDFN IR #23.</p> <p>The Proponent has identified three (3) reasonably foreseeable induced (RFI) access roads resulting from the Project: Izok Lake Mine Access Road, Hacket River Project and Back River Access Road, and Grays Bay Road and Port Phase 2 – Jericho Mine to NT Border (p. 16-125).</p> <p>The Proponent states that “[U]nder RFI conditions, adverse residual cumulative effects are expected for BCH range disturbance, habitat, movement, and mortality risk” (p 16-143).</p> <p>Yet “no additional mitigation, management, and enhancement measures are proposed beyond those identified to address Project-related effects” (p 16-131).</p>
Information Request:	Please confirm that the Proponent has not committed to adding gated entry-points at each new access road that may connect to the GBR over time, including the three RFI access roads listed above (Izok Lake Mine Access Road, Hacket River Project and Back River Access Road, and Grays Bay Road and Port Phase 2 – Jericho Mine to NT Border (p. 16-125)), and if so, why not?

IR Source:	YKDFN
IR Number:	YKDFN IR #31
IR Directed To:	West Kitikmeot Resources Corp.
Subject:	Risk threshold for annual caribou mortality
Reference:	Grays Bay Road and Port Project Impact Statement, Volume 6: Terrestrial Environment, 16.1.6.4 Magnitude: Change in Mortality Risk, p. 16-24; 16.4.4.4 Project Residual Effect, p. 16-112; 16.4.6 Summary of Project Residual Effects on Caribou, p. 16-115 to 16-119; and 16.5 Assessment of Cumulative Effects on Caribou.
Issue/Concern:	<p>See YKDFN IR #23.</p> <p>The Proponent does not adopt the lowest annual caribou harvest rate as the threshold to identify the highest magnitude of annual change in mortality risk.</p> <p>Governments have set total allowable harvest (TAH) for caribou as follows:</p> <ul style="list-style-type: none"> • Northwest Territories: BCH caribou = zero • Nunavut: <ul style="list-style-type: none"> ○ BCH caribou = zero cows or calves, 10 bulls per year (which comprises 0.28% of the herd’s 2025 population size estimate); ○ DUH caribou = 105 per year (which comprises 2.01% of the herd’s 2023 population size estimate). <p>The Proponent states that “Given the Critical Low status of the BCH and the Endangered status of the DUH, the lower annual harvest rate (0.28%) is set as the threshold to identify the highest magnitude of annual change in mortality risk.” This is not accurate.</p>
Information Request:	<p>a) Does the Proponent agree that the lowest annual harvest rate for caribou standing to be impacted by the Project is <u>zero caribou</u> (i.e. 0% or no mortality), as established by the Northwest Territories for BCH?</p>

	<p>b) If zero caribou (i.e. 0% or no mortality), rather than 0.28%, were used as the highest magnitude of annual change, what aspects of assessing the Project’s effect would change? Please list all changes, but specifically discuss any changes to:</p> <ul style="list-style-type: none"> i. what constitutes a “negligible”, “low”, “moderate” and “high” impact to herd size (see, e.g. p 16-24); ii. the magnitude of the combined direct and indirect sources of mortality risk from the Project to caribou (see, e.g., p. 16-112); iii. change in mortality risk resulting from the Project (see, e.g., p. 16-116, 16-118). <p>c) Please answer (a) and (b) as they apply to assessing the cumulative effects of the Project (see, e.g., Volume 6, section 16.5).</p> <p>d) Does the Proponent agree that the annual harvest rate for BCH females and calves (and therefore the lowest) is <u>zero BCH females and zero BCH calves</u> (i.e. 0% or no mortality), as established by both the Northwest Territories and the Government of Nunavut? Please explain how this has been taken into account, and if not, explain why.</p> <p>e) If zero BCH females and zero BCH calves (i.e. 0% or no mortality), rather than 0.28%, were used as the highest magnitude of annual change, what aspects of assessing the Project’s effect would change? Please list all changes, but specifically discuss any changes to:</p> <ul style="list-style-type: none"> i. what constitutes a “negligible”, “low”, “moderate” and “high” impact to herd size (see, e.g. p 16-24); ii. the magnitude of the combined direct and indirect sources of mortality risk from the Project to caribou (see, e.g., p. 16-112);
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	<p>iii. change in mortality risk resulting from the Project (see, e.g., p. 16-116, 16-118).</p> <p>f) Please answer (d) and (e) as they apply to assessing the cumulative effects of the Project (see, e.g., Volume 6, section 16.5).</p>
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IR Source:	YKDFN
IR Number:	YKDFN IR #32
IR Directed To:	West Kitikmeot Resources Corp.
Subject:	Caribou mortality risks – overharvesting and illegal hunting
Reference:	Grays Bay Road and Port Project Impact Statement, Volume 6: Terrestrial Environment, 16.4.4.2 Project Effects Pathways, p 16-109; 16.4.6.1 Bathurst Caribou Herd, Change in Mortality Risk, p. 16-118; 16.4.4.4 Project Residual Effect, p. 16-113; 16.5.1 Project Residual Effects Likely to Interact Cumulatively with Residual Effects from Other Physical Activities, p. 16-125; 16.5.5 Change In Mortality Risk, p. 16-141.
Issue/Concern:	<p>See YKDFN IR #23.</p> <p>The Proponent does not account for increased risk of caribou mortality arising from overharvesting and illegal hunting.</p> <p>The Proponent acknowledges that “[i]ncreased access to a landscape from roads can lead to legal overharvesting and illegal hunting and poaching” (p. 16-109).</p> <p>Yet, the Proponent states that “[t]he contribution of hunting to excess mortality risk will be negligible due to the TAH [Total Allowable Harvest] limit for the BCH (i.e. 10 bulls in NU, zero caribou in NT).” This implicitly and incorrectly assumes that the imposition of a TAH will prevent all overharvesting and illegal hunting. As a result, the increased risk to</p>

	<p>caribou mortality from overharvesting and illegal hunting arising from the Project has not been taken into account properly or at all.</p> <p>Concerns regarding overharvesting and illegal hunting are amplified as the Proponent states that the “principal purpose” of the Project is “to create a multi-use infrastructure that will connect the Kitikmeot Region by land and sea”.⁹</p>
<p>Information Request:</p>	<p>a) What are the rates of overharvesting and illegal hunting, respectively, on the BCH in Nunavut and the NWT? If unknown, provide a best estimate or range of estimates of same, the basis for the estimates, and any sources relied on.</p> <p>b) If the above estimated or actual rates were factored into the assessment of the Project’s effects on caribou mortality risk, what aspects of that assessment would change? Please list all changes, but specifically discuss any changes to:</p> <ul style="list-style-type: none"> i. what constitutes a “negligible”, “low”, “moderate” and “high” impact to herd size (see, e.g. p 16-24); ii. the magnitude of the combined direct and indirect sources of mortality risk from the Project to caribou (see, e.g., p. 16-112); iii. change in mortality risk resulting from the Project (see, e.g., p. 16-116, 16-118). <p>c) Please answer the same questions with respect to the cumulative effects of the Project. In doing so, please discuss the three (3) reasonably foreseeable induced (RFI) access roads resulting from the Project identified by the Proponent (i.e.: Izok Lake Mine Access Road, Hackett River Project and Back River Access Road, and Grays Bay Road and Port Phase 2 – Jericho Mine to NT Border (p. 16-125)).</p>

⁹ PIS, Vol. 2: Introduction, Project Description and Alternatives, 1.6 Project Purpose and Need.

IR Source:	YKDFN
IR Number:	YKDFN IR #33
IR Directed To:	West Kitikmeot Resources Corp.
Subject:	Caribou mortality risks – overharvesting and illegal hunting; further mitigation measures available
Reference:	Grays Bay Road and Port Project Impact Statement, Volume 6: Terrestrial Environment, 16.4.4.4 Project Residual Effect, p. 16-113; 16.5.1 Project Residual Effects Likely to Interact Cumulatively with Residual Effects from Other Physical Activities, p. 16-125; 16.5.5 Change In Mortality Risk, p. 16-141
Issue/Concern:	See YKDFN IRs #23 and 24.
Information Request:	<p>a) Please confirm that the Proponent has <u>not</u> committed to the following measures with respect to overharvesting and illegal hunting of the BCH:</p> <ul style="list-style-type: none"> i. an Indigenous-run guardianship program to: monitor hunting activity; educate individuals using the Road; and/or assist with enforcement; ii. one or more gated and manned check points along the Road to monitor hunting and caribou activity; iii. cameras, intermittent drone surveillance, and other monitoring devices; iv. vehicle checking at access points to confirm compliance with hunting restrictions and, other enforcement mechanisms; and, v. hunter education programs; signs; and other educational measures. <p>b) For each of the measures described above, does the Proponent agree that implementing the measure could reduce overharvesting and illegal hunting of BCH associated with the Project? If not, why not?</p>

	<p>c) Please answer the same questions with respect to the cumulative effects of the Project. In doing so, please discuss the three (3) reasonably foreseeable induced (RFI) access roads resulting from the Project identified by the Proponent (i.e.: Izok Lake Mine Access Road, Hacket River Project and Back River Access Road, and Grays Bay Road and Port Phase 2 – Jericho Mine to NT Border (p. 16-125)).</p>
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IR Source:	YKDFN
IR Number:	YKDFN IR #34
IR Directed To:	West Kitikmeot Resources Corp.
Subject:	Cumulative effects on the BCH
Reference:	Grays Bay Road and Port Project Impact Statement, Volume 6: Terrestrial Environment, 16.5.5.3 Cumulative Effects, p. 16-141; 16.5.1. Project Residual Effects Likely to Interact Cumulatively with Residual Effects from Other Physical Activities.
Issue/Concern:	<p>The following analysis regarding the cumulative effects on the BCH is unclear and appears internally contradictory:</p> <p>“Under RFI conditions, the combined effects of direct and indirect mortality risks are expected to be low in magnitude for the BCH (1 to 5 <u>excess</u> caribou mortalities). Direct mortality from vehicle collisions, and indirect mortality from predation and hunting, are <u>not expected to change</u> between Project conditions and RFI conditions.” (p. 16-141, emphasis added)</p> <p>The Proponent has identified three (3) reasonably foreseeable induced (RFI) access roads resulting from the Project: Izok Lake Mine Access Road, Hacket River Project and Back River Access Road, and Grays Bay Road and Port Phase 2 – Jericho Mine to NT Border (p. 16-125).</p>

Information Request:	<p>a) Does the Proponent expect there to be additional caribou mortalities between Project conditions and RFI conditions? If so, how many and from what causes? If not, why not?</p> <p>b) In answering the above questions, please specifically address the three RFI access roads noted above (Izok Lake Mine Access Road, Hacket River Project and Back River Access Road, and Grays Bay Road and Port Phase 2 – Jericho Mine to NT Border (p. 16-125)).</p>
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IR Source:	YKDFN
IR Number:	YKDFN IR #35
IR Directed To:	West Kitikmeot Resources Corp.
Subject:	Grays Bay Road and Port: Road Traffic – Cumulative Effects on Caribou
Reference:	Grays Bay Road and Port Project Impact Statement, Volume 6: Terrestrial Environment, Table 16.16 Interactions with the Potential to Contribute to Cumulative Effects on Mainland and Island Caribou, p. 16-128.
Issue/Concern:	<p>At Table 16.16, the Proponent lists “Grays Bay Road and Port: Road Traffic” as a “Reasonably Foreseeable Induced” physical activity with residual effects on mainland (BCH) caribou and island (DUH) caribou that are likely to interact cumulatively with the residual effects of the Project (p. 16-128).</p> <p>Clarification on this assessment, and the basis and underlying information for it, is sought.</p>
Information Request:	<p>a) Please describe the “Grays Bay Road and Port: Road Traffic” referenced at Table 16.16. In addition, please explain:</p> <ul style="list-style-type: none"> i. Why is Grays Bay Road and Port: Road Traffic a reasonably foreseeable induced activity of the proposed Project and not part of the Project?

	<ul style="list-style-type: none"> ii. What are its expected residual effects on BCH and DUH? iii. How do these expected residual effects interact cumulatively with the residual effects of the Project? iv. What are the proposed estimates in traffic based upon? <p>Please provide the basis and underlying information for each of the questions above.</p>
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IR Source:	YKDFN
IR Number:	YKDFN IR #36
IR Directed To:	West Kitikmeot Resources Corp., NIRB, MVEIRB
Subject:	Cumulative Impacts of the Project on Caribou
Reference:	Grays Bay Road and Port Project Impact Statement, Volume 6: Terrestrial Environment, Table 16.16 Interactions with the Potential to Contribute to Cumulative Effects on Mainland and Island Caribou, pp. 16-127 to 16-128; Volume 10: Additional Assessments and Conclusions, 32.3 Regional and Future Perspectives, p. 32-12.
Issue/Concern:	<p>The Proponent states that “[f]uture possible infrastructure south of the Project, notably the reasonably foreseeable all-season road from Yellowknife to the territorial border, combined with the RFI project of Phase 2, would provide all-season road access between the southern road network and the central Arctic coast. The implications of this are likely substantial to human use, although highly uncertain on specific details. The term “Arctic Economic and Security Corridor” (GNWT n.d.a) has recently been recognized as reflecting such access to provide “...a generational opportunity to foster long-term economic resiliency and sustainable development...” (p. 23-12, emphasis added)</p> <p>Yet, the Proponent notes that with respect to cumulative effects on caribou, including the BCH, “interactions between the residual effects of [the AESC] and the residual effects of the Project are not expected” (p. 16-128, emphasis added).</p>

	Further clarity is needed on these assertions.
Information Request:	On what basis and information does the Proponent state that it does not expect interactions between the residual effects of the Arctic Economic and Security Corridor and the Project (p. 16-127 and 16-128)?

II. Alternatives Assessment

IR Source:	YKDFN
IR Number:	YKDFN IR #37
IR Directed To:	West Kitikmeot Resources Corp.
Subject:	Alternatives Analysis
Reference:	Grays Bay Road and Port Project Impact Statement, Volume 1: Main Document, MD 2.4 Alternatives, p. MD-13
Issue/Concern:	The NIRB process requires the assessment of alternatives for the Project. The Impact Statement states that “a considerable number of studies regarding alternative means of carrying out various components of the Project have been conducted”(p. MD-13). The studies referenced have not been included with the materials.
Information Request:	YKDFN requests that the Proponent provide the studies that have assessed alternatives for the Project.

IR Source:	YKDFN
IR Number:	YKDFN IR #38
IR Directed To:	West Kitikmeot Resources Corp.

Subject:	Alternatives for the Road to Avoid Caribou Calving Grounds
Reference:	Grays Bay Road and Port Project Impact Statement, Volume 2: Introduction, Project Description and Alternatives, 2.4 Alternatives, p. 2-12
Issue/Concern:	<p>The Impact Statement states that:</p> <p style="padding-left: 40px;">In 2016, an alternate road alignment was evaluated to avoid overlap of the published mapping of core calving grounds from the Government of Nunavut, which have subsequently been used in the Nunavut Planning Commission’s Draft Nunavut Land Use Plan. This alignment was not carried forward based on the additional 50% length added to the road, two bridge crossings that would be greater than 100 m in length, the more rugged topography with a higher number of valleys and hills that would increase the road footprint and require additional fill areas; all of these resulted in additional design and construction costs for the road and less desirable vehicle operation and safety considerations. Therefore, this route option was not carried forward. (p. 2-12)</p> <p>The analysis carried out in 2016 is not provided with the materials submitted by the Proponent. No further analysis is undertaken of alternative routes for the GBR, including in light of the significant decline of the BCH in the last ten years.</p>
Information Request:	<p>YKDFN requests that the Proponent provide the following information:</p> <ul style="list-style-type: none"> a) Any study or analysis undertaken of alternative routes for the road in 2016. b) Maps and analysis of any other routes that have been considered for the road prior to or after 2016. c) Is the Proponent open to considering alternate routes for the road that avoid caribou calving areas?

IR Source:	YKDFN
IR Number:	YKDFN IR #39
IR Directed To:	West Kitikmeot Resources Corp.
Subject:	Alternatives for the Road to Connection to the Northwest Territories and
Reference:	Grays Bay Road and Port Project Impact Statement, Volume 2: Introduction, Project Description and Alternatives, 2.4 Alternatives, p. 2-12; Grays Bay Road and Port Project Impact Statement, Volume 1: Main Document, p. ES-6, ES-13
Issue/Concern:	<p>The Impact Statement sets out that the approximately 230 km all-season road from Grays Bay to Jericho Station will connect to an approximate 3 km winter road, connecting to the seasonal TCWR.</p> <p>The current TCWR does not connect to the Nunavut border. The Impact Statement notes that “[a]nnual construction of the TCWR from the Contwoyto Lake shoreline to the Nunavut (NU)/Northwest Territories (NT) border is not considered part of the project scope, as the activity has been previously screened for these works and activities” (p. ES-6).</p> <p>Further, the Arctic Economic and Security Corridor is currently in development and would be an all-season road through the Slave Geological Province to the Nunavut border. The route for the Arctic Economic and Security Corridor is still being determined. The Arctic Economic and Security Corridor expressly contemplates connecting to the GBR and establishing the first all-season road linking Nunavut to the national highway system.</p> <p>Finally, the Impact Statement notes that:</p> <p style="padding-left: 40px;">Future development of a permanent all-season road from the southern terminus of the Grays Bay Road at Jericho Station to the NU/NT border has been considered.</p>

	<p>This extension would be pursued as a separate project or as a future expansion of the Project. (p. ES-13)</p>
<p>Information Request:</p>	<p>YKDFN requests that the Proponent provide the following information:</p> <ul style="list-style-type: none"> a) As the current TCWR does not connect to Nunavut, why are the effects of that expansion not considered as part of this Project? b) As the current TCWR will need to be expanded to connect to the Project, how will the effects of that expansion, including the contribution to cumulative effects, be assessed and considered? c) How, if at all, has the expansion of the current TCWR been factored into the effects assessment, including the cumulative effects assessment, for the Project? d) Given that the Project is proposed to connect to the Arctic Economic and Security Corridor, how has the routing for the Arctic Economic and Security Corridor been considered in setting the route for the all-season and winter Road for the Project? e) Has the Proponent recently engaged with the proponents for the Arctic Economic and Security Corridor on routing? If not, why not? f) Has the Proponent engaged with Indigenous governments, including those in the NWT, about the location for the GBR? If not, why not? g) Is the Proponent open to considering alternate routes for the GBR to align with the Arctic Economic and Security Corridor? h) Why has the development of a permanent all-season road from Jericho Station to the Nunavut/ NWT border not been considered as part of this Project?

III. Benefits to Indigenous Groups

IR Source:	YKDFN
IR Number:	YKDFN IR #40
IR Directed To:	West Kitikmeot Resources Corp.
Subject:	Benefits to Indigenous Groups
Reference:	Grays Bay Road and Port Project Impact Statement, Volume 1: Main Document, 2.5 Economic and Employment Information, p. MD-14; Grays Bay Road and Port Project Impact Statement, Volume 2: Introduction, Project Description and Alternatives, 2.5.5 Contracting and Procurement, p. 2-24.
Issue/Concern:	<p>The Impact Statement notes that “WKR’s procurement and training strategies are designed to prioritize local and Inuit participation in Project employment and business opportunities, further reinforcing strong social ties” (p. MD-14).</p> <p>The Impact Statement goes on to note the opportunities for Inuit owned businesses, but is silent on the opportunities for other Indigenous groups.</p> <p>The Project has the potential to impact Indigenous groups that have constitutionally protected rights in the Project area.</p>
Information Request:	<p>YKDFN requests that the Proponent provide the following information:</p> <p>a) As an Indigenous group with rights in the Project area that stand to be impacted, will YKDFN members and their businesses be prioritized for training, employment and procurement opportunities for the Project?</p>

	b) Has the Proponent engaged directly with YKDFN with respect to training, procurement and employment opportunities for the Project? If not, why not?
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IV. Impacts to Section 35 Rights

IR Source:	YKDFN
IR Number:	YKDFN IR #41
IR Directed To:	West Kitikmeot Resources Corp.
Subject:	Impacts to section 35 rights
Reference:	Grays Bay Road and Port Project Impact Statement, Volume 3: Inuit Knowledge, Indigenous Knowledge, Community Knowledge and Perspectives, 4.1.2 Indigenous Knowledge, p. 4-2, 4-3; Summary of Key Issues, p. 6-12
Issue/Concern:	<p>The Impact Statement notes that “[a]s outlined in the NIRB IS Guidelines (NIRB 2026), WKR is required to assess potential effects on Indigenous groups asserting section 35 rights (of the Canadian Constitution Act, 1982) within the Project Development Area” (p. 4-2).</p> <p>The summary of key issues raised by Indigenous groups during engagement highlights the concerns about caribou movement and the protection of caribou calving areas.</p>
Information Request:	<p>YKDFN requests that the Proponent provide the following information:</p> <p>a) What is the Proponent’s assessment of the significance of the impacts of the Project on Indigenous groups asserting section 35 rights within the Project area?</p> <p>b) Please indicate what information the assessment in (a) is based upon and provide that information.</p>

	c) Will the Proponent take into account the concerns about caribou movement and the protection of calving areas from Indigenous groups and consider alternate routes for the Project?
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V. Transboundary Impacts

IR Source:	YKDFN
IR Number:	YKDFN IR #42
IR Directed To:	West Kitikmeot Resources Corp.
Subject:	Transboundary Impacts
Reference:	Grays Bay Road and Port Project Impact Statement, Volume 10: Additional Assessments and Conclusions, 33.5.1 Traditional Land, Marine and Resource Use, p. 33-24, 33-25
Issue/Concern:	<p>The Traditional Land, Marine, and Resource Use (TLMRU) of Indigenous groups stands to be impacted by the trans boundary effects of the Project. The Impact Statement highlights that concerns have been raised with respect to the adverse transboundary effects on the BCH and their migratory patterns.</p> <p>The Impact Statement notes that “adverse transboundary effects on TLMRU may occur as the availability, accessibility, and stability of harvested resources and TLMRU activities may be affected by Project-related activities” and that “[t]here is potential for transboundary effects on the stability of the traditional food system as a result of changes to wildlife distribution and wildlife habitat, which could affect harvesting success for individuals in NT” (pp. 33-24, 33-25). However, the Impact Statement does not assess the significance of these adverse effects.</p>
Information Request:	YKDFN requests that the Proponent provide the following information:

	<ul style="list-style-type: none">a) In the Proponent's view, what is the significance assessment of the adverse transboundary effects on TLMRU and food security of Indigenous groups?b) Please confirm that the Proponent's assessment of trans boundary effects on TLMRU considered Indigenous groups collectively.c) Has the significance assessment for trans boundary effects on TLMRU and food security considered the potential for caribou to change their migration route?d) Has the significance assessment for trans boundary effects on TLMRU considered the potential for the Bathurst Caribou Herd to not recover and continue to decline?e) What is the anticipated increase in traffic on the TCWR as a result of the Project in the construction and operation phases?f) What are the specific mitigation measures and management/monitoring plans that will be in place for trans boundary effects on TLMRU and food security? Please provide copies of any trans boundary effect management/monitoring plans?
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