



July 3, 2026

Kelli Gillard
Manager, Impact Assessment
Nunavut Impact Review Board
PO BOX 1360
CAMBRIDGE BAY, NU X0B 0C0

by EMAIL

Dear Kelli Gillard:

The Government of the Northwest Territories' Information Requests for the West Kitikmeot Resources Corporation's Grays Bay Road and Port Project Proposal (NIRB File No. 24XN038)

The Government of the Northwest Territories GNWT is providing the attached Information Requests (IRs) on the Grays Bay Road and Port (GBRP) in response to the Nunavut Impact Review Board's (NIRB) May 6, 2026 invitation to parties to review the Revised Impact Statement (Revised IS) for the project and submit IRs. All GNWT departments with jurisdiction, mandates and interests related to the project have had the opportunity to review and provide input to the IRs. In developing the IRs, the GNWT has considered the potential impacts of the project on NWT residents and environments, and has built on previous GNWT input to the NIRB review.

With respect to the GNWT's current priorities, the GBRP and other proposed projects in the territories can help to close transportation and renewable energy infrastructure gaps that have been barriers to sustainable economic development and job creation for northerners. The GBRP project is an important project that offers significant job creation and business opportunities to NWT residents. The GNWT recognizes that ecosystem goods and services are also an important source of wealth and benefits to Northwest Territories (NWT) residents, and that careful consideration must be given in project review to ensure northern lands and resources are managed sustainably over the long term.

In general terms, the GNWT's IRs address the following topics:

- Impacts on the NWT health care system, community health and well-being;
- Impacts on Traditional Land, Marine, and Resource Use;
- Impacts on NWT wildlife such as barren-ground caribou and marine mammals;
- Economic effects and opportunities, including labour market impacts and procurement considerations;
- Impacts on NWT transportation and infrastructure;
- Involvement of NWT Indigenous groups, including integration of NWT Indigenous Knowledge;
- Assessment methodology, including use of NWT data, transboundary, and cumulative effects, and induced development; and

- Consideration of evidence generated by the Mackenzie Valley Environmental Impact Review Board, the Environmental Impact Screening Committee and/or the Environmental Impact Review Board.

The GNWT looks forward to continued participation in NIRB's review and continues to be supportive of collaboration initiatives among Nunavut and NWT impact assessment bodies in relation to the GBRP. Should NIRB or any participants have any questions about this submission, please contact Aswathy Mary (Ash) Varghese, Project Assessment Analyst by email at Ash.Varghese@gov.nt.ca or by phone at 867-767-9180 ext. 24024 or Alison Heslep, Manager, Project Assessment Branch by email at Alison.Heslep@gov.nt.ca or by phone at 867-767-9180 ext. 24021.

Sincerely,



Lorraine Seale
Director
Impact Assessment and Security Management
Environment and Climate Change
Government of the Northwest Territories

Attachment:

- Information Request table

IR Source	IR No	IR Directed To	Subject	Reference	Issue/Concern	Information Request
INFORMATION REQUEST ON REVISED IMPACT STATEMENT						
GNWT	1	Proponent	Assessment of NWT Economic Effects and Labour Market Impacts	Volume 2 Chapter 2; Volume 9, Chapter 27; and NIRB Final EIS Guidelines Section 6.5	<p>The IS identifies that the Project will rely on labour, contractors, and services from across Canada, including the NWT, and notes the role of Yellowknife and the NWT as key transit hubs and sources of labour and supply. However, economic effects are modelled and presented primarily for Nunavut, with NWT effects aggregated within “Other Canada.” Similarly, while baseline data for the NWT are included, changes from baseline and labour market effects are not disaggregated for the NWT, and there is limited information on the Project’s anticipated reliance on NWT labour or the implications for the NWT labour market.</p> <p>This limits the ability to assess the distribution of economic benefits and potential labour market effects in the NWT, consistent with NIRB Final EIS Guidelines (Section 6.5).</p>	<p>Provide additional analysis and disaggregation to support the assessment of NWT economic and labour market effects, including:</p> <p>a) Economic Effects Modelling</p> <ul style="list-style-type: none"> • Projections of GDP, full-time equivalents (FTEs), and labour income (direct, indirect, and induced) for the NWT • Disaggregated results for NWT in tables presenting economic changes from baseline (e.g., GDP, employment income, taxes), separate from “Other Canada” • Consideration of territorial and national distribution of benefits, including the share retained in the NWT and Canada overall <p>b) Labour Demand and Supply</p> <ul style="list-style-type: none"> • Estimated number of NWT residents expected to be employed during construction and operations • Anticipated average annual salaries (or ranges) for these positions • Assessment of whether workers will be drawn from existing employment or unemployed/underemployed labour <p>c) Labour Market Effects</p>

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						<ul style="list-style-type: none"> Assessment of potential effects on the NWT labour market, including labour displacement, competition, and potential shortages Evaluation of available NWT labour supply relative to Project demand, including key occupations Consideration of regional and community-level labour availability, where feasible Inclusion of a labour competition analysis for the NWT comparable to that provided for Nunavut.
GNWT	2	Proponent	Charter Flights From Yellowknife Airport	Volume 2, Chapter 2	<p>Yellowknife is identified in the IR as a “designated pick-up point” for employees to be flown by chartered flights to the Project site. Potential changes in service demand at the Yellowknife Airport are not included in the IS.</p> <p>Increased service demand at Yellowknife Airport is not assessed.</p>	Provide information on the number and frequency of anticipated chartered flights. Clarify if Yellowknife will primarily be a transfer point, or if workers will also be from the NWT. This information will help assess whether Project-related charter flights could increase demand on Yellowknife Airport services and operations, with resulting implications for the Yellowknife Airport Revolving Fund.
GNWT	3	Proponent	Assessing NWT Mineral Development	Volume 2; Volume 4, Attachment 9A1; and Volume 9, Chap. 27	<p>The NIRB Final Environmental Impact Statement Guidelines require proponents to clearly identify and justify the selection of other projects and activities considered in cumulative effects assessment, and to apply transparent, well-supported assumptions and methods in evaluating those effects.</p> <p>Potential mineral development facilitated by the Project is assessed for Nunavut only, although several NWT mine sites are listed as “reasonably foreseeable.” However, the basis for their</p>	<p>Provide:</p> <ul style="list-style-type: none"> an assessment of potential NWT mineral development facilitated by the Project be assessed. Description and criteria used to identify “reasonably foreseeable developments” a justification of the inclusion of NWT projects including NICO, Yellowknife Gold Project, Courageous Lake, etc.

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					<p>inclusion, including their development status, timing, and likelihood of proceeding, is not clearly described.</p> <p>In addition, the IS does not clearly assess the extent to which the Grays Bay Road and Port Project may facilitate or enable future mineral development activity, including the potential redevelopment of closed and abandoned mine sites, within the NWT.</p>	<ul style="list-style-type: none"> A summary of additional information on the identified RFDs including current development, anticipated timelines, key assumptions, etc.
GNWT	4	Proponent	Identification of Potentially Affected Indigenous Groups and Transboundary Engagement Structures	Volume 3, Sections 6.1, 6.2; and Volume 9, Section 24.3.6	<p>The IS refers to “other potentially affected Indigenous groups” but does not clearly define this term or describe how such groups were identified, particularly in the NWT context.</p> <p>While engagement is described as inclusive and relationship-based, no formal or ongoing engagement structures (e.g., advisory groups, joint forums, or coordination mechanisms) are identified for NWT Indigenous groups. Given the potential for transboundary effects and the participation of NWT Indigenous groups in the assessment process, it is unclear how ongoing, project-specific engagement will be structured and sustained.</p>	<p>Provide clarification on the identification and engagement of NWT Indigenous groups, including:</p> <p>a) Definition and Identification</p> <ul style="list-style-type: none"> A clear definition of “other potentially affected Indigenous groups” as used in the IS Description of how NWT Indigenous groups were identified or, alternatively, how decisions to not include certain groups were made <p>b) Consideration of Governance Structures</p> <ul style="list-style-type: none"> How established NWT multi-governmental and co-management forums (e.g., wildlife management boards) were considered in identifying and engaging potentially affected groups <p>c) Engagement Structures</p> <ul style="list-style-type: none"> Description of any formal or structured engagement forums, advisory bodies, or coordination

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						<p>mechanisms established or planned for NWT Indigenous groups</p> <ul style="list-style-type: none"> If none are in place, rationale for not establishing dedicated transboundary engagement or coordination mechanisms <p>d) Future Approach Planned approach to establish or support formalized engagement structures for NWT Indigenous participation in future project phases, including monitoring, follow-up, and adaptive management</p>
GNWT	5	Proponent	Transboundary Engagement with NWT Indigenous Groups	Volume 3, Sections 6.1.1.2, 6.3, 6.3.3, 6.3.5, 6.3.6; and IS Guidelines Sections 8.2 and 9	<p>The IS identifies engagement with NWT Indigenous groups (e.g., Tłı̨ch̨o, Gwich'in, Sahtu, North Slave Métis); however, there is limited detail on the scope, frequency, and continuity of engagement activities relative to Kitikmeot communities.</p> <p>While engagement outcomes are summarized, the IS does not clearly demonstrate how input from NWT Indigenous groups influenced baseline conditions, effects assessment, mitigation, or monitoring. This suggests limited integration of transboundary perspectives.</p> <p>In addition, while the proponent commits to ongoing engagement, future engagement activities are primarily described for Kitikmeot communities, with no clear commitments for sustained and</p>	<p>Provide clarification on the scope, outcomes, and future approach to engagement with NWT Indigenous groups, including:</p> <p>a) Engagement Scope and Activities</p> <ul style="list-style-type: none"> Detailed record of engagement activities with each NWT Indigenous group (dates, format, participation, topics) Frequency and duration of engagement, including comparison with Kitikmeot communities Explanation of how engagement scope was determined for NWT groups Description of engagement methods used, and rationale for any differences in approach or intensity

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					structured participation of NWT Indigenous groups across project phases.	<p>b) Integration of Engagement Outcomes</p> <ul style="list-style-type: none"> • Identification of issues raised by NWT Indigenous groups • Description of how these inputs influenced baseline conditions, effects pathways, mitigation, and monitoring • Examples where NWT input resulted in changes to the Project or assessment <p>c) Future Engagement and Participation</p> <ul style="list-style-type: none"> • Description of planned engagement activities with NWT Indigenous groups during construction and operations • Frequency and format of future engagement • Measures to ensure ongoing, structured transboundary participation.
GNWT	6	Proponent	Transboundary Monitoring, Roles, and Adaptive Management	Volume 4, Chapter 9, and Section 9.5; Volume 10, Chapters 31, 33;	<p>The IS outlines monitoring and adaptive management approaches informed by engagement and Inuit Knowledge; however, there is limited clarity on how transboundary considerations are incorporated. While the Proponent commits to monitoring and providing rationale where follow-up is not proposed for a VC, the monitoring framework does not identify:</p> <ul style="list-style-type: none"> • Processes for notifying NWT Indigenous groups when monitoring identifies effects on transboundary resources; and 	<p>Provide clarification on transboundary monitoring and adaptive management, including:</p> <p>a) Notification and Coordination</p> <ul style="list-style-type: none"> • Processes for notifying NWT Indigenous groups when monitoring identifies unanticipated effects on transboundary resources • Mechanisms for coordination between jurisdictions when monitoring results trigger adaptive management actions

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				<p>Volume 11 Chapter 37.</p>	<ul style="list-style-type: none"> The roles of GNWT agencies and NWT Indigenous groups in monitoring, threshold development, and adaptive management. <p>Given that shared resources (e.g., TCWR, transboundary water systems, and wildlife) fall within NWT jurisdictional interests, monitoring outcomes and associated management responses in Nunavut may have implications for the NWT. The absence of defined coordination and notification mechanisms limits clarity on how transboundary effects will be managed across jurisdictions.</p>	<p>b) Roles and Participation</p> <ul style="list-style-type: none"> Description of proposed roles for GNWT agencies and NWT Indigenous groups in monitoring, follow-up, and adaptive management programs <p>c) Indicators and Thresholds</p> <ul style="list-style-type: none"> Identification of transboundary indicators and thresholds relevant to NWT interests <p>d) Adaptive Management Integration</p> <p>Description of how monitoring results will inform adaptive management across jurisdictions, including how decisions will be coordinated where transboundary resources are affected.</p>
GNWT	7	Proponent	Transboundary VC Identification, Spatial Boundaries, and Assessment	<p>Volume 4, Chapter 9, Sections 9.2.4, 9.4.2; and</p> <p>Volume 10, Chapters 32, 33.</p>	<p>The IS defines spatial boundaries (PDA, LAA, RAA) based on zones of influence and engagement, with emphasis on Inuit Knowledge; however, the extent to which NWT land use, harvesting areas, and ecological ranges were considered in delineating VC-specific RAAs is not clearly described.</p> <p>The IS also indicates that relatively few VCs are expected to have transboundary effects based on the Project's location within Nunavut; however, the criteria used to identify VCs with transboundary potential are not clearly defined.</p> <p>While transboundary effects are assessed for select VCs (e.g., caribou, marine mammals, socio-economic factors), the basis for</p>	<p>Provide clarification on the identification, scoping, and assessment of transboundary VCs, including:</p> <p>a) VC Identification</p> <ul style="list-style-type: none"> Criteria used to identify VCs with potential transboundary effects List of VCs assessed as having transboundary relevance Explanation of how shared resources (e.g., caribou, migratory species, water systems, marine systems) were considered in determining inclusion or exclusion

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					<p>their inclusion and the extent to which NWT-specific receptors, datasets, and conditions were incorporated, it was not consistently described.</p> <p>Collectively, this limits transparency in how transboundary considerations informed VC identification, spatial boundaries, and the application of the transboundary effects assessment.</p>	<p>b) Spatial Boundaries (RAAs)</p> <ul style="list-style-type: none"> Description of how NWT land use, harvesting areas, and ecological ranges were considered in defining VC-specific RAAs Identification of VCs where RAAs do not extend into NWT despite transboundary characteristics Rationale for boundary delineations where NWT areas were not included <p>c) Application of Transboundary Assessment</p> <ul style="list-style-type: none"> Description of how transboundary effects were assessed for each VC Explanation of how NWT-specific receptors, datasets, and conditions were incorporated <p>Confirmation of consistency in approach across VCs or rationale for differences.</p>
GNWT	8	Proponent	Baseline Inputs and Significance Thresholds - NWT Consideration	Volume 4, Chapter 9, Sections 9.3 and 9.4.1.4; IS Guidelines Sections 2.1 and 8.1	<p>The IS indicates that baseline conditions and effects assessment are informed by available datasets, Inuit Knowledge, and professional judgment; however, the extent to which data and knowledge from NWT sources (e.g., GNWT datasets, co-management boards, Indigenous Knowledge) were incorporated for each VC is not clearly described.</p> <p>Similarly, while significance thresholds are based on regulatory requirements, engagement, and professional judgment, it is unclear how NWT regulatory standards, management objectives, or</p>	<p>Provide clarification on the incorporation of NWT inputs in baseline development and significance determination, including:</p> <p>a) Baseline Data Inputs</p> <ul style="list-style-type: none"> Identification of baseline data sources from NWT (including GNWT datasets, co-management boards, and Indigenous Knowledge) for each VC Identification of VCs where no NWT baseline data were incorporated

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					<p>Indigenous-defined thresholds were considered in defining these criteria.</p> <p>Collectively, this limits transparency regarding how NWT inputs informed both the characterization of baseline conditions and the determination of significance across VCs.</p>	<ul style="list-style-type: none"> Explanation of data availability or methodological considerations influencing inclusion or exclusion <p>b) Significance Thresholds</p> <ul style="list-style-type: none"> Description of how NWT regulatory standards, management objectives, or Indigenous-defined thresholds were considered in defining significance criteria Identification of VCs where thresholds are based solely on Nunavut-specific or Inuit-derived criteria Rationale for selecting thresholds where multiple jurisdictional standards exist.
GNWT	9	Proponent	Transboundary Effects on TCWR - Air Quality, Climate Risk, and Infrastructure	<p>Volume 5, Sections 11.1.4, 12.3.2;</p> <p>Volume 9, Section MD.9.5.2;</p> <p>Volume 10, Section MD.10.3;</p>	<p>The IS identifies the Tibbitt–Contwoyto Winter Road (TCWR) as a key construction supply route, including connections from Jericho Station to Contwoyto Lake and into the NWT. While the Project has the potential to result in transboundary effects through increased transportation activity, the assessment is limited in its consideration of effects within the NWT.</p> <p>Specifically:</p> <ul style="list-style-type: none"> The air quality Local and Regional Assessment Areas (LAA/RAA) are defined as a 5 km buffer around the PDA and do not extend into the NWT, and no assessment is provided of emissions or dust along NWT portions of the TCWR; 	<p>Provide clarification and additional analysis of transboundary effects on the TCWR corridor, including:</p> <p>a) Air Quality Effects</p> <ul style="list-style-type: none"> Whether air quality effects (including vehicle emissions and dust) are predicted at the southern terminus of the winter road and along NWT portions of the TCWR; Rationale for defining the air quality RAA as a 5 km buffer around the PDA, and how this boundary captures potential transboundary effects. <p>b) Climate Risk and Infrastructure</p> <ul style="list-style-type: none"> Basis for limiting the climate risk assessment to the Nunavut PDA, given reliance on Jericho–Lupin

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				Volume 4, Section 9.2.4.1.	<ul style="list-style-type: none"> Climate projections for the Jericho–Lupin region inform risks to winter road operability (e.g., permafrost thaw, aufeis), yet no assessment is provided of how these risks may affect shared infrastructure that depend on the TCWR; and Project-related trucking is identified as a transboundary activity, but effects on the structural integrity and capacity of the TCWR and related NWT infrastructure are not assessed. <p>Collectively, this limits the assessment of transboundary effects on a shared infrastructure corridor.</p>	<p>projections to characterize risks to winter road operability;</p> <ul style="list-style-type: none"> Description of how climate-related risks (e.g., permafrost degradation, reduced operability) may affect NWT portions of the TCWR and dependent infrastructure or users <p>c) Transportation and Infrastructure Effects</p> <ul style="list-style-type: none"> Description of materials to be transported, approximate truckload weights, and expected frequency of trucking along the TCWR; Assessment of potential effects on the structural stability and capacity of the TCWR and connected NWT infrastructure; Proposed mitigation measures to address potential infrastructure-related impacts.
GNWT	10	Proponent	Dust Effects on Vegetation and Monitoring (Anticipated indirect effects on vegetation)	Volume 6, Sections 6.2.2 and 6.2.5.	The IS identifies indirect effects of dust deposition on vegetation and vegetation communities as being limited to 40 m from the Project Development Area (PDA); however, available literature indicates that effects on vegetation structure and composition may extend beyond this distance. While mitigation measures include implementation of a dust control program, no monitoring program is identified to verify the extent of effects.	<p>Provide clarification on dust-related effects to vegetation, including:</p> <p>a) Effects Characterization</p> <ul style="list-style-type: none"> Rationale and supporting evidence for limiting dust-related effects on vegetation and vegetation communities to 40 m from the PDA <p>b) Monitoring</p>

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						Whether a dust and vegetation monitoring program will be implemented to capture direct and indirect effects, including spatial extent, and if so, a description of the program.
GNWT	11	Proponent	Caribou Habitat Disturbance and Movement - Effects Characterization and Methodology	Volume 6, Sections 6.3.2 and 6.3.3	<p>The IS presents multiple indicators of Project-related disturbance to caribou habitat (BCH-RAA1), including range disturbance and changes in seasonal habitat, which appear inconsistent in magnitude (e.g., 1,804.2 km² vs. 55.2 km²). The IS also concludes that a substantial increase in range disturbance (59%) does not increase risk to caribou or habitat, without sufficient explanation.</p> <p>In addition, the IS provides estimates of increased annual exposure to human disturbance for Bathurst and Dolphin and Union herds (BCH and DUH) under both project-specific and cumulative effects scenarios; however, the methodology used to derive these values is not described.</p>	<p>Provide clarification and supporting details regarding caribou habitat disturbance and movement effects, including:</p> <p>a) Habitat Disturbance Metrics</p> <ul style="list-style-type: none"> Clarification of the discrepancy between reported disturbance values (e.g., 1,804.2 km² vs. 55.2 km²), including definitions, methods, and spatial scope used <p>b) Effects Interpretation</p> <ul style="list-style-type: none"> Rationale for concluding that a 59% increase in range disturbance does not increase risk to caribou and caribou habitat <p>c) Movement and Disturbance Exposure</p> <p>Detailed description of the methodology used to calculate the net increase in annual exposure to human disturbance for BCH and DUH under both project-specific and cumulative effects scenarios, including assumptions, inputs, and analytical approach</p>
GNWT	12	Proponent	Caribou Mitigation Thresholds,	Volume 6, Table 16.8);	The Wildlife Management and Monitoring Plan (WMMP) defines multiple thresholds and measures for caribou protection, including site alerts (Level 3), temporary shutdowns (Level 4), blasting	Provide clarification and justification for caribou mitigation thresholds and monitoring approaches, including:

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			Buffers, and Monitoring	<p>Appendix 37B, Sections 6.3, 6.4, Tables 7.1 and 8.2;</p> <p>Volume 10, Chapters 31, 33</p>	<p>restrictions, and zone of influence (ZOI) buffers. However, key thresholds (e.g., “within sight” distances for Level 3 and 4 triggers) are not clearly defined. In addition, proposed thresholds for blasting and disturbance (e.g., 500 m exclusion zone and ≥25 caribou group size) differ from commonly applied mitigation measures in the NWT.</p> <p>The IS also applies ZOI buffers that may not reflect the full range of values reported in recent literature or established planning tools (e.g., Bathurst Caribou Range Plan). There is limited information on how these thresholds were selected or how their effectiveness will be evaluated through monitoring.</p> <p>The assessment applies the Bathurst Caribou Range Plan threshold and considers cumulative disturbance; however, application of GNWT co-management frameworks, consideration of multiple transboundary herds, and integration of NWT management context are not fully described.</p>	<p>a) Assessment Framework and Herd Consideration</p> <ul style="list-style-type: none"> • Description of how GNWT co-management frameworks and thresholds were incorporated into the caribou assessment • Identification of all caribou herds considered and their relevance to the Project • Explanation of how cumulative disturbance to caribou habitat across jurisdictions was evaluated, with a focus on habitat quantity, quality, and connectivity. <p>b) Site Alert and Shutdown Thresholds</p> <ul style="list-style-type: none"> • Definition of “within sight,” including distances from the road or infrastructure used to trigger Level 3 (site alerts) and Level 4 (temporary shutdowns) <p>c) Blasting Mitigation</p> <ul style="list-style-type: none"> • Rationale for proposed blasting thresholds (e.g., 500 m exclusion zone and ≥25 caribou) • Consideration of established practices in the NWT (e.g., ≥1 km exclusion zone and ≥50 caribou within 5 km), or justification for deviation <p>d) Zone of Influence (ZOI)</p> <ul style="list-style-type: none"> • Rationale for selected ZOI buffers used in the assessment, including consideration of Bathurst Caribou Range Plan guidance and updated literature

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						<ul style="list-style-type: none"> Whether application of a 5 km ZOI buffer for roads and ports was considered in the assessment of indirect effects <p>e) Monitoring and Validation</p> <ul style="list-style-type: none"> Description of monitoring approaches (e.g., GPS collar data, on-the-ground monitoring) to assess caribou response to project infrastructure and mitigation measures How monitoring results will be used to evaluate and adapt mitigation measures, including effectiveness of road closures and ZOI assumptions.
GNWT	13	Proponent	NWT Procurement Strategy	Volume 9, Chapters 24, 25, 26, and 27	The Proponent is developing/implementing a Procurement Strategy (26.5.3 and 27.3.3.2) focused on Inuit contracting opportunities. However, the IS also states (27.1.1.1) that “Kitikmeot communities and Yellowknife are interested in procurement and employment opportunities” and that “during early project engagement, the Tłıchǫ Government recommended that jobs should be available for local businesses that are tied to the Tlıcho Investment Corporation (GBRP 2027).”	Clarify if the Inuit-focused Procurement Strategy (27.3.3.2) being developed by the Proponent include accommodations for Tłıchǫ, Yellowknife-based and other NWT businesses, or if a separate procurement strategy will be developed for NWT businesses.
GNWT	14	Proponent	Cumulative Effects - NWT Inclusion in Regional Context	Volume 10, Chapters 31, 32	Cumulative effects are assessed using a regional context including multiple activities and induced scenarios; however, the extent to which NWT ecological, harvesting, and socio-economic systems are represented within this regional context and cumulative pathways is not clearly described.	Provide: <ul style="list-style-type: none"> a) Description of how NWT ecological systems, harvesting areas, and socio-economic conditions were incorporated into the cumulative effects assessment;

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						<ul style="list-style-type: none"> b) Identification of cumulative pathways that extend into NWT; c) Explanation of how NWT-based activities and stressors were considered in cumulative analysis.
GNWT	15	The Proponent	Road Management and Related Plans	Appendix 37A -Road Management Plan (Draft). Section 2.2, Table 2.2, Pages 6-7.	<p>Appendix 37A describes the Road Management Plan (RMP). Table 2.2 presents a list of related Management Plans. However, two important Management Plans appear to have been omitted.</p> <p>1. Permafrost Management Plan Concerns regarding permafrost degradation have been raised and discussed throughout the IS, largely in relation to climate change. However, road construction projects, such as the Grays Bay Road Project, may further accelerate the permafrost degradation process. It is therefore imperative that a Permafrost Management Plan be developed and implemented for both the construction and the operations and maintenance phases of the project.</p> <p>2. Adaptive Management Plan (AMP) Section 7.2 of the IS describes adaptive management; however, the level of detail provided appears to be insufficient for a project of this scale and scope. A detailed stand-alone AMP would be more appropriate.</p> <p>The Road Management Plan is expected to undergo an internal review annually, or as needed, to confirm the effectiveness of the management measures and update the plan accordingly. In the absence of a condition requiring the proponent to submit the</p>	<p>1. Permafrost Management Plan</p> <ul style="list-style-type: none"> a) Has the proponent considered developing a Permafrost Management Plan? b) If not, provide a rationale. <p>2. Adaptive Management Plan</p> <ul style="list-style-type: none"> a) Would the proponent consider developing a detailed stand-alone Adaptive Management Plan? b) If not, provide a rationale.

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					annual review of the plan for approval by a specified annual deadline (e.g. March 31 of each year), there is a risk that this commitment may not be consistently undertaken.	
GNWT	16	Proponent	Monitoring Activities for Traditional Land, Marine, Resource Use (TLMRU)	Volume 9, Chapter 24, Section 24.7; Table 24.2.	The IS identifies potential effects on wildlife that may influence TLMRU for Kitikmeot and other potentially affected Indigenous groups, including transboundary effects. While the Proponent commits to adaptive management and engagement, there is limited clarity on how TLMRU will be monitored, particularly with respect to qualitative indicators and inclusion of NWT Indigenous communities.	Provide clarification on TLMRU monitoring, including: a) Whether qualitative parameters in Table 24.2 (e.g., perceptions of resource health and cultural connection) will be monitored, and under which program(s); b) Which Indigenous communities, including in the NWT, will be included and how; and c) How monitoring will inform adaptive management for transboundary effects.
GNWT	17	Proponent	Monitoring and Assessment of Food Security and Community Health and Well-being	Volume 9, Sections 25.1.4.1, 25.3.5.1; Volume 9, Chapter 26, Sections 26.1.3, 26.7; IS Guidelines	The IS identifies pathways linking project-related changes in wildlife to impacts on traditional food systems, cultural practices, and community health and well-being, including transboundary effects. However, there is limited clarity on the basis for excluding NWT communities from the Food Security VC and on how food security and health (including mental health) effects will be monitored.	Provide clarification on food security and health monitoring and assessment, including: a) Rationale for excluding NWT Indigenous communities (including, and beyond, Yellowknife) from the Food Security VC; b) Whether parameters for “Change in Traditional Food System” (Table 25.1) will be included in the Socio-Economic Monitoring Plan (SEMP), and which communities will be included; c) Whether and how health (including mental health) and well-being effects linked to changes in TLMRU and cultural practices will be monitored;

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				Sections 8.2.6 and 8.2.9.3		d) How monitoring will account for transboundary effects affecting NWT communities.
GNWT	18	Proponent (WKR; West Kitikmeot Resources Corp.) and Government of Nunavut	Medevac and Healthcare System Demand	Volume 9, Chapter 26 - Section 26.3.3.3	The Proponent relies on comparison data (e.g., B2Gold Back River Project) to characterize potential demand on NWT medevac and health services; however, the absence of annual personnel data alongside medevac utilization limits the ability to estimate project-specific demand. Additional gaps include a lack of detail on onsite medical capacity at work camps and unclear responsibility for medical travel costs, particularly where non-resident workers require transfer beyond Yellowknife for higher-level care. Past experience indicates GNWT resources are often used for onward transfers, with cost recovery challenges. Collectively, this limits the ability to assess potential impacts on NWT healthcare system capacity, consistent with NIRB Final EIS Guidelines (Section 8.2.10.3).	<p>Provide information to support a clearer understanding of potential demand and responsibilities related to NWT health services, including:</p> <p>a) Comparable Project Data</p> <ul style="list-style-type: none"> • Annual personnel numbers • Annual medevac requirements • Health service utilization rates <p>b) Onsite Medical Capacity</p> <ul style="list-style-type: none"> • Description of onsite medical services (hours of coverage, staffing) • Diagnostic and treatment capabilities (e.g., X-ray, lab, point-of-care testing) • Types of conditions managed onsite and criteria for external transfer <p>c) Medical Travel and Cost Responsibility</p> <ul style="list-style-type: none"> • Responsibility for medical transport costs where non-resident workers require transfer beyond Yellowknife

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						<ul style="list-style-type: none"> • Whether insurance coverage will be required for non-resident workers, or whether costs will be borne by the proponent or Government of Nunavut • Any planned agreements between the Proponent and the Government of Nunavut to formalize cost responsibility <p>d) Coordination with NWT</p> <ul style="list-style-type: none"> • How arrangements will account for potential reliance on GNWT air ambulance and health services, including coordination or cost recovery mechanisms.
GNWT	19	Proponent and NIRB	Consideration of Transboundary Scoping Guidance	Revised Impact Statement (Revised IS; IS); NIRB's Final Impact Statement Guidelines ; Supplemental Transbound	To inform the assessment of transboundary and transregional impacts, NIRB appended the following to the Final Scope and Guidelines: <ul style="list-style-type: none"> • MVEIRB's Supplemental Transboundary Scoping Report (STSR), developed in accordance with the <i>NIRB and MVEIRB Cooperation Plan for Assessing Transboundary/Transregional Impacts of the Proposed Grays Bay Road and Port Project</i> and Section 142 of the <i>Mackenzie Valley Resource Management Act</i>, and • comments from the Environmental Impact Screening Committee (EISC) For the Inuvialuit Settlement Region (ISR) and the Environmental Impact Review Board (EIRB) for the ISR on the draft Scope and Guideline. 	<p>a) Consideration of STSR (Proponent)</p> <ul style="list-style-type: none"> • Identify how and where the recommendations outlined in the STSR and comments from the EISC and the EIRB were considered and incorporated into the IS • Provide rationale where recommendations were not adopted <p>b) Consideration of STSR and comments from the EISC and the EIRB (NIRB)</p> <ul style="list-style-type: none"> • Describe how the IS was reviewed in light of the STSR and the comments from the EISC and the EIRB • Provide rationale supporting the conclusion that the content of the IS is sufficient to assess transboundary and transregional impacts

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				<p>dary Scoping Report (STSR)</p>	<p>The Revised IS does not clearly indicate how the STSR or the EISC and EIRB comments informed the Proponent's assessment. As a result, it is unclear whether, or how, recommended approaches for assessing potential impacts in the Mackenzie Valley or the ISR have been incorporated to date. The GNWT acknowledges that in the ISR, assessment processes are ongoing.</p> <p>This lack of clarity raises concerns regarding whether sufficient information has been provided to support a meaningful review of potential impacts in the Mackenzie Valley and ISR.</p>	<p>c) Consideration Clarify expectations for transboundary effects assessment, including the requirement to incorporate NWT context, relevant baseline information, and input from NWT Indigenous groups, and any necessary references to other assessment bodies' processes.</p>