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July 3, 2026

Information Requests Pertaining to West Kitikmeot Resources Corp.'s Impact Statement for the Grays Bay Road and Port Project Proposal

Chair, Albert Ehaloak
Nunavut Impact Review Board (NIRB)
By Email: info@nirb.ca

Dear Mr. Ehaloak:

Thank you for the opportunity to submit Information Requests on West Kitikmeot Resources Corp.'s Impact Statement for the Grays Bay Road and Port Project.

Oceans North is an environmental organization focused on the health of Canada's marine ecosystems and the coastal communities that depend on them. We participate in regulatory processes like this one because we believe major projects deserve a rigorous, evidence-based review — one that weighs environmental risk and community well-being together, rather than separately.

We recognize that to many people in the Kitikmeot region and beyond this Project represents a chance at new jobs, a lower cost of living, and a stronger economic future for the region. We take that hope seriously and we ask the questions below in that same spirit — to help ensure the Project's potential benefits are real and fairly weighed against its risks before the Project is approved.

In brief, our Information Requests ask for three things.

1. Economics - a clearer picture of the Project's actual costs, revenues, and long-term financial obligations, and how much of its promised economic benefit depends on other mines being built that are not yet before the Board
2. Marine Impacts – a proper accounting of impacts to marine life and the subsequent impacts to regional and transboundary Inuit harvesting and culture
3. Community benefits – clarity on who will be allowed to use the road and port, the associated costs, and how the listed benefits — lower resupply costs, jobs, training — will reach local people.

Oceans North submits these Information Requests while maintaining its position that all works and activities sufficiently related to the Project, including related ground transportation, trucking, marine shipping and induced transportation must be assessed within the scope of the review. Oceans North has commenced an application for judicial review regarding the scoping of the Project, and nothing in these Information Requests should be taken as a departure from that position.

Sincerely,

A handwritten signature in dark ink, appearing to read 'Christopher Debicki', with a long horizontal flourish extending to the right.

Christopher Debicki

Vice President, Policy Development and Counsel

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Detailed Information Requests Directed to Project Proponent and, where indicated, responsible public authorities

ON-01: Marine Environment: Underwater Noise – Underwater sound propagation model

IR Source	Oceans North
IR No.	ON-01
IR Directed To:	West Kitikmeot Resources Corp. (Project proponent)
Subject:	Marine Environment – Characterization, prediction, verification and adaptive management of underwater sound effects on marine mammals
Reference:	Impact Statement Volume 8, Section 23.2.2.3 (Regional Soundscape); Section 23.3.3 (Change in Behaviour Caused by Sensory Disturbance); Section 23.3.4 (Change in Mortality and/or Injury Risk); Section 23.5 (Mitigation and Monitoring); Wildlife Mitigation and Monitoring Plan; Final EIS Guidelines Sections 8.1.13 and 8.1.14
Issue/Concern:	The Impact Statement identifies underwater sound generated during marine construction and vessel operations as Project activities that may affect marine mammals. The assessment presents source levels for several construction activities and applies marine mammal auditory injury criteria in evaluating potential effects. However, the Impact Statement provides limited information describing how predicted underwater sound exposure has been translated into expected behavioural responses of marine mammals under Project-specific conditions, how uncertainty associated with those predictions has been characterized, and how that uncertainty has been incorporated into the significance determination. Behavioural responses of marine mammals to anthropogenic underwater sound are influenced by multiple interacting factors, including species, behavioural state, season, habitat use, source characteristics, and environmental conditions. Consequently, generalized acoustic thresholds and received sound level metrics may not fully represent biologically relevant responses under Project-specific conditions. Without species- and region-specific information to characterize those responses, conclusions regarding residual effects and the effectiveness of proposed mitigation measures may be subject to greater uncertainty.
Rationale:	The Final EIS Guidelines require the Proponent to characterize Project-related underwater marine acoustics, assess potential effects of underwater noise on marine wildlife, evaluate the significance of those effects, and develop appropriate mitigation, monitoring, and adaptive management measures. Achieving these objectives requires sufficient information to support predictions of marine mammal behavioural responses under Project-specific conditions and to characterize the uncertainty associated with those predictions. Accordingly, the EIS would benefit from a transparent description of the methods used to predict behavioural responses, the assumptions and uncertainties associated with those predictions, and the framework by which those predictions will be evaluated through monitoring and adaptive management. Providing this information during preparation and review of the Environmental Impact Statement would strengthen the technical foundation of the assessment, facilitate consideration of additional scientific, community-based, and regulatory information as it becomes available during the review process, and support a transparent evaluation of residual effects and mitigation effectiveness by NIRB and all intervenors.
Information Request:	Please provide: (a) higher-resolution spatial information describing the anticipated Project access corridors, including expected Project-related vessel approach and departure routes through the Coronation Gulf region, sufficient to support evaluation of the potential spatial extent of underwater sound exposure for marine fish and marine mammals; (b) to the extent not already filed publicly on the NIRB record, the technical reports, data summaries and supporting documentation describing the marine mammal baseline studies relied upon in the

	Impact Statement, including the Nunami Stantec 2025 marine mammal survey report, the LGL 2012 marine mammal survey report, and any additional technical reports supporting the characterization of marine mammal occurrence, underwater sound or baseline environmental conditions within the Project area; and (c) a description of the approach used, or proposed to be used, to characterize and evaluate behavioural responses of marine mammals to Project-related underwater sound during construction and operations, including how Project-specific behavioural context and uncertainty are incorporated into the assessment, and how monitoring and adaptive management will be used to evaluate and respond to those predictions.
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ON-02: Human Environment: Economic and Employment Information - Disclosure of total capital cost, closure cost, and revenue projections

IR Source	Oceans North
IR No.	ON-02
IR Directed To:	West Kitikmeot Resources Corp. (Project proponent)
Subject:	Human Environment: Economic and Employment Information - Disclosure of total capital cost, closure cost, and revenue projections
Reference:	Impact Statement, Volume 9, Section 27.3.1.1 (Statistics Canada Inter-Provincial Input-Output Model); Section 27.3.6.3 (Change in Contracting and Business Opportunities – Project Residual Effect, capital and operating expenditure); Section 29 (road and port use fee arrangements); Final IS Guidelines, Section 6.5 (“Economic and Employment Information”)
Issue/Concern:	Section 6.5 of the Final IS Guidelines requires the Impact Statement to provide “capital costs, estimated operating costs, including closure costs and the total expected revenues (current market values).” The Impact Statement discloses a total capital expenditure of \$1.2 billion for the five-year Construction phase and an estimated annual operating expenditure of \$38.2 million during Operations and Maintenance (Section 27.3.6.3), and provides Statistics Canada Inter-Provincial Input-Output Model (SCIPIOM) outputs for GDP, employment, and government revenue contributions resulting from Project expenditures. However, the \$1.2 billion capital estimate is not broken down by major Project component (e.g., road, port marine infrastructure, port landside infrastructure, aerodrome, Jericho Station), the Impact Statement does not disclose any closure or decommissioning cost estimate – consistent with its description of the Project elsewhere as intended to operate “in perpetuity” with “no plan to decommission or abandon the Project” (Section 24.1.4.2) – and it does not disclose the Project’s revenue model, including the basis for the port and road use fees that Section 29 indicates are still “to be established through agreements between WKR and mining/exploration companies.” Without a component-level cost breakdown, a closure/decommissioning cost estimate, and revenue model information, the Board and the public cannot independently assess the economic feasibility of the Project, verify the SCIPIOM model’s capital and operating expenditure inputs against the figures disclosed in Section 27.3.6.3, or evaluate the adequacy of any future financial security requirements for closure and decommissioning.
Rationale:	The disclosed capital and operating expenditure figures appear to provide only a partial response to Final IS Guidelines Section 6.5. The absence of a component-level breakdown, a closure/decommissioning cost estimate, and revenue model detail means the Guidelines requirement is not yet fully met. Capital cost, closure cost and revenue information underpins the economic justification for the Project (NuPPAA s.103(a)) and is necessary to assess the credibility of GDP and employment projections, the adequacy of future closure and decommissioning financial assurances, and the long-term economic sustainability of Project operations
Information Request:	Please provide: (a) a breakdown of the disclosed \$1.2 billion total capital expenditure (Section 27.3.6.3) by major Project component (e.g., road, port marine infrastructure, port landside infrastructure, aerodrome, Jericho Station); (b) confirmation of whether the \$1.2 billion capital expenditure and \$38.2 million annual operating expenditure figures disclosed in Section 27.3.6.3 are the same capital and operating expenditure

	estimates used as inputs to the SCIPIOM model (Section 27.3.1.1), and if not, an explanation of the difference; (c) a description of the anticipated revenue model for the Project, including the proposed basis, rate-setting methodology, or timeline for the port and road use fees referenced in Sections 27 and 29 as to be established through agreements between WKR and mining/exploration companies, and whether such fees will also apply to other third-party or public users; (d) a closure or decommissioning cost estimate, and a description of who would bear cost overruns, operating deficits, maintenance liabilities, closure costs, abandonment risk and long-term care-and-maintenance obligations; (e) any current business case, feasibility study, cost-benefit analysis, financing plan, public-funding analysis, private-financing analysis or net-benefit analysis prepared for, by or on behalf of WKR; (f) a sources-and-uses table for construction, commissioning and early operations, identifying public grants/contributions, public loans, private equity, private debt, shareholder contributions, contingent funding and any remaining funding gap; (g) any funding conditions tied to induced developments, public/security uses, traffic volumes, tolls, tariffs or minimum revenue levels; and (h) if WKR considers any information provided in response to paragraphs (e) through (g) to be confidential, a non-confidential summary and an indication of whether the information can be provided to NIRB through an appropriate confidentiality process.
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ON-03: Human Environment: Economic and Employment Information – Clarifications on GDP estimates inconsistencies

IR Source	Oceans North
IR No.	ON-03
IR Directed To:	West Kitikmeot Resources Corp. (Project proponent)
Subject:	Human Environment: Economic and Employment Information – Clarifications on GDP estimates inconsistencies
Reference:	Impact Statement Fact Sheet (Volume 1); Impact Statement, Volume 9, Section 27.3.3.3 and Tables 27.14–27.17 (SCIPIOM-based GDP estimates)
Issue/Concern:	The Project Fact Sheet states that the Project is expected to generate approximately \$750 million in additional annual GDP growth by 2040. However, the SCIPIOM-based assessment in Section 27.3.3.3 estimates total Project-related GDP effects (direct, indirect, and induced) in Nunavut of approximately \$74.8 million annually during the five-year Construction phase, declining to a lower figure during Operations and Maintenance. These two figures differ by an order of magnitude, and the Impact Statement does not explain the relationship between them (e.g., whether the \$750 million figure includes GDP attributable to reasonably foreseeable induced mining projects such as Hackett River and the Izok Corridor Project, rather than the Grays Bay Road and Port Project alone). This inconsistency, if unresolved, creates a material risk that decision-makers, Inuit organizations, and the public will rely on an economic benefit figure that substantially overstates the direct contribution of the Project under review.
Rationale:	Accurate and internally consistent economic information is fundamental to the Board's assessment of the purpose, need, and economic rationale for the Project under NuPPAA s.103(a)-(b) and Final IS Guidelines Section 6.2.
Information Request:	Please provide a reconciliation of the \$750 million annual GDP figure presented in the Project Fact Sheet with the SCIPIOM-based GDP estimates in Section 27.3.3.3, including: (a) An explanation of what activities, time periods, and geographic scope are included in the \$750 million figure (e.g., does it include induced mining projects, and if so, which ones and on what assumptions regarding their development timelines and production levels?); (b) A breakdown showing the relative contribution of the Grays Bay Road and Port Project itself versus reasonably foreseeable induced projects to the \$750 million figure; and (c) Confirmation of which figure (the Fact Sheet figure or the SCIPIOM Section 27.3.3.3 figures) should be relied upon by the Board in assessing the economic justification for the Project under review.

ON-04: Human Environment: Economic Model - Sensitivity analysis of economic benefits to the status of Reasonably Foreseeable Induced projects

IR Source	Oceans North
IR No.	ON-04
IR Directed To:	West Kitikmeot Resources Corp. (Project proponent)
Subject:	Human Environment / Cumulative Effects - Economic Dependency on Induced Projects
Reference:	Impact Statement, Volume 8, Sections 21-23; Volume 9, Section 27.2.1 (SCIPIOM Model Inputs and Limitations); Volume 10, Section 32 (Cumulative Effects Assessment -- Project Inclusion List); Final IS Guidelines, Section 6.4 (Future Development)
Issue/Concern:	The Impact Statement relies on reasonably foreseeable induced projects — the Hackett River Project and the Izok Corridor Project (High Lake and Izok Lake) — for the Project's estimated economic benefits, traffic assumptions, and cumulative-effects assessment, yet the status, probability, timing, financing, and permitting assumptions for each are not presented in sufficient detail to test the Project's benefits and impacts. The SCIPIOM model incorporates these projects' capital and operating expenditures (Section 27.2.1), but the Impact Statement does not disclose how much of the Project's estimated GDP, employment, revenue, and resupply benefits depend on them proceeding as assumed, nor does it provide a sensitivity analysis of how those benefits would change if one or more were delayed, scaled back, or not developed. Final IS Guidelines Section 6.4 requires sufficient information on foreseeable future development so the Project is not assessed in a way that overstates independent benefits (i.e., "project splitting" in reverse - attributing benefits of other projects to this one). A sensitivity analysis is necessary for the Board to understand how much the Project's economic case depends on other proposals not before it for decision.
Rationale:	NIRB cannot assess the Project's purpose, need, economic rationale, cumulative effects, alternatives or mitigation without understanding which induced projects are assumed to proceed, how likely they are to proceed, and the degree to which the Project's asserted benefits depend on those assumptions.
Information Request:	For each reasonably foreseeable induced project included in the Impact Statement, economic model, traffic forecast, marine assessment or cumulative-effects assessment (including the Hackett River Project and the Izok Corridor Project), please provide: (a) project name, owner/proponent, commodity, location and relationship to the road/port corridor; (b) current exploration, licensing, assessment, financing and permitting status; (c) assumed construction date, operating date, production volume, mine life, closure date and development probability; (d) assumed trucking volumes, shipping volumes, fuel/resupply volumes and port use; and (e) the basis for including the project as reasonably foreseeable or reasonably foreseeable induced. Using the information provided in response to (a) through (e), please also provide: (f) a breakdown of the SCIPIOM-modelled economic benefits (GDP, direct/indirect/induced employment, and government revenue) attributable to (i) the Grays Bay Road and Port Project alone (i.e., construction and operation of the road, port, aerodrome, and Jericho Station, absent any induced mine traffic) and (ii) each reasonably foreseeable induced project included in the model; (g) a sensitivity analysis or scenario comparison illustrating how the Project's economic benefit estimates would change under at least two alternative scenarios: (i) no reasonably foreseeable induced projects proceed within the Project's operating life, and (ii) only a subset of the induced projects proceed (e.g., Izok Corridor but not Hackett River, or vice versa); and (h) a table separating adverse ecosystemic and socio-economic effects attributable to the Grays Bay Road and Port Project alone from those attributable to each reasonably foreseeable induced project, consistent with the cumulative effects assessment in Volume 10.

ON-05: Human Environment: Closure and Reclamation - Socio-economic effects and dependency risks

IR Source	Oceans North
IR No.	ON-05
IR Directed To:	West Kitikmeot Resources Corp. (Project proponent)
Subject:	Human Environment: Closure and Reclamation - Socio-economic effects and dependency risks
Reference:	Impact Statement, Volume 10, Section 11.4 (Closure and Reclamation Plan) and Section 11.4.1 (Care and Maintenance Plan); Volume 9, Section 27 (Employment and Economy); Final IS Guidelines, Section 11.4
Issue/Concern:	The Impact Statement describes the Project as consisting primarily of permanent infrastructure intended to operate “in perpetuity,” and on this basis does not provide a conceptual closure and reclamation plan addressing the requirements of Final IS Guidelines Section 11.4 (e.g., demonstration that closure has been considered at early stages of design; description of how environmental effects would be reduced if the Project ceased operations; re-establishing pre-Project land use where applicable). A preliminary Care and Maintenance Plan is referenced but not developed. From a socio-economic perspective, the “in perpetuity” framing does not address the risk that communities, having become economically engaged with and potentially dependent on Project-related employment, training, and procurement opportunities (and on induced mining activity facilitated by the Project), could experience significant adverse effects if Project operations were to be reduced, suspended, or wound down in the future (whether due to market conditions affecting induced mines, or other causes). A socio-economic transition/dependency risk assessment is necessary to ensure that the benefits described in Section 27 are evaluated alongside the risks associated with the economic relationships the Project will create, particularly given the dependence of the Project’s own economic case on reasonably foreseeable induced mining projects.
Rationale:	Closure, care-and-maintenance, temporary suspension and economic-dependency scenarios are necessary to assess the Project’s socio-economic risks over its lifecycle, particularly where the Project is described as permanent infrastructure intended to operate in perpetuity and where local businesses and workers may become reliant on Project-related activity.
Information Request:	Please provide: (a) An assessment of the potential socio-economic effects on Kitikmeot communities if Project operations were delayed, significantly reduced, temporarily suspended (e.g., consistent with the Care and Maintenance Plan referenced in Section 11.4.1), or permanently ceased, including effects on employment, training investments, and businesses that have become reliant on Project-related contracts; and (b) A description of any measures proposed to mitigate this economic dependency risk (e.g., diversification support, transition planning, or financial mechanisms), and how these measures would be developed in consultation with the Kitikmeot Inuit Association and affected communities.

ON-06: Marine Habitat & Cumulative Effects – Modelling of icebreaking-related impacts

IR Source	Oceans North
IR No.	ON-06
IR Directed To:	West Kitikmeot Resources Corp. (Project proponent)
Subject:	Marine Habitat & Cumulative Effects – Ice fragmentation analysis and modelling of icebreaking-related impacts
Reference:	Impact Statement, Volume 8, Section 23.2.2.2 (Marine Habitat – Sea Ice) and Section 23.3.2/23.4.2 (Vessel Activity); Volume 10, Section 32 (Cumulative Effects Assessment Overview, Inclusion List); Final IS Guidelines, Section 8.1.13

Issue/Concern:	The Impact Statement commits that “no icebreaking will occur during normal port operations” and that the Port will operate only during the open-water season (late June to October), with the exception of Canadian Coast Guard (CCG) vessels accessing the Port for crew changes during the shoulder season. On this basis, the Impact Statement does not include a sea ice fragmentation analysis, an ice-vessel interaction model, or any quantitative assessment of icebreaking-related environmental, operational, or ecological effects. However, this approach leaves at least two pathways unassessed. First, the Inclusion List for the cumulative effects assessment (Section 32) and the Project’s own traffic projections of third-party and induced vessels (e.g., CCG, Arctic Offshore Patrol Ships, and vessels associated with the Hackett River and Izok Corridor Projects) that may seek to access the Port during shoulder-season periods when residual sea ice could be present, regardless of the Proponent’s own “no icebreaking” commitment for Project vessels. Second, the Impact Statement’s sea ice baseline (Section 23.2.2.2) is derived from historical or regional data sources rather than from a Project-specific characterization of shoulder-season ice conditions, ice thickness, or break-up/freeze-up timing at the Port site and along the access corridor. Without an assessment of icebreaking-related effects for “non-Project” vessels, the Board cannot evaluate the adequacy of the “open-water season only” commitment as a mitigation measure for the full range of vessels reasonably expected to use the Port over its operating life, nor can it assess potential effects on ice-dependent species (e.g., ringed seal pupping habitat) from any icebreaking that may occur outside the Proponent’s own operations.
Rationale:	Final IS Guidelines Section 8.1.13 requires assessment of Project-related shipping effects on the marine environment, including ice-related effects, and the Board’s consideration of cumulative impacts under NuPPAA s.103(f)–(g) extends to the third-party and induced vessel traffic identified in the Project’s own Inclusion List. The Proponent’s “no icebreaking” commitment addresses Project-operated vessels but does not, on its own, demonstrate that icebreaking-related effects will not occur at the Port over its operating life. A sea ice fragmentation analysis and a Project-specific shoulder-season ice characterization are necessary to confirm that the open-water-season restriction functions as an effective and durable mitigation measure for all vessels using the Port, not only those operated directly by the Proponent.
Information Request:	Please provide: (a) A Project-specific characterization of sea ice conditions at the Port site and along the marine access corridor during the shoulder seasons (approximately late May to early July, and October to December), including typical ice thickness, timing of break-up and freeze-up, and inter-annual variability, sufficient to define the practical boundaries of the “open-water season only” operating window; (b) An assessment of whether, and under what circumstances, third-party or induced vessels identified in the Cumulative Effects Assessment Inclusion List (Section 32) – including CCG vessels and vessels associated with reasonably foreseeable induced projects such as Hackett River and Izok Corridor – might require icebreaking to access the Port outside the open-water season, and if so, an analysis of the potential environmental and ecological effects of such icebreaking (including on ice-dependent species such as ringed seal); and (c) A description of any monitoring, reporting, or approval/enforcement protocol that would apply if a vessel (Project-related or third-party) requested or required icebreaking support to access the Port outside the committed open-water season, including how such a request would be evaluated against the Project’s environmental commitments.

ON-07: Project Operations / Human Environment - Road and port access, tolls, tariffs, user agreements and capacity allocation

IR Source	Oceans North
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IR No.	ON-07
IR Directed To:	West Kitikmeot Resources Corp. (Project proponent)
Subject:	Project Operations / Human Environment - Road and port access, tolls, tariffs, user agreements and capacity allocation
Reference:	Impact Statement, Volume 2, Project Description; Volume 8, Sections 21-23; Volume 9, Sections 24, 25, 27, 28 and 29.
Issue/Concern:	The Project is presented as multi-user infrastructure. However, the Impact Statement does not provide sufficient information on who may use the road and port, how access will be granted or refused, what users will pay, how capacity will be allocated, and how user rules will be enforced.
Rationale:	Access rules, tariffs and user agreements are necessary to test Project purpose and need, community benefits, affordability, induced-development assumptions, traffic forecasts, cumulative effects, safety, security and mitigation enforceability.
Information Request:	Please provide: (a) the proposed road and port access policy; (b) all user classes, including mine users, exploration users, community users, harvesters, commercial users, public users, emergency users, Coast Guard, Canadian military and other security users; (c) whether access is discretionary, contractual, common-carrier-like, priority-based or subject to WKR approval; (d) draft access agreements, term sheets, tariff schedules or standard conditions of use; (e) proposed tolls, tariffs, wharfage, handling charges, port fees, fuel fees, road fees and exemptions; (f) whether rates will be regulated, negotiated or set unilaterally by WKR; (g) how capacity will be allocated among competing users; (h) whether safety, security, lender, revenue, capacity or priority-user considerations may restrict public or community access; and (i) how access rules and fee assumptions were incorporated into the Project's economic model, traffic forecasts, community-benefit claims and cumulative-effects assessment.

ON-08: Project Governance / Benefit Distribution – Benefit allocation and commercial assumptions

IR Source	Oceans North
IR No.	ON-08
IR Directed To:	West Kitikmeot Resources Corp. (Project proponent)
Subject:	Project Governance / Benefit Distribution – Benefit allocation and commercial assumptions
Reference:	Impact Statement, Volume 2, Project Description and Alternatives; Volume 9, Sections 27-29; Project Fact Sheet; NuPPAA, s. 103.
Issue/Concern:	The Project is presented as public-purpose, multi-user infrastructure with anticipated benefits relating to access, resupply, employment, procurement, induced development, public or security uses, and regional economic activity. The Impact Statement does not include a consolidated description of the ownership, governance, financing, commercial-interest and benefit-allocation arrangements that are relevant to understanding how the Project would be developed, funded, used, operated and monetized over time. A consolidated description of these arrangements would assist NIRB and parties in understanding the assumptions underlying the Project's purpose and need, public/private benefit distribution, user access, tolls and tariffs, induced-development assumptions, procurement, monitoring, mitigation and long-term operations.
Rationale:	Where a project is advanced as public-purpose, multi-user infrastructure, the review record should clearly identify the commercial and governance arrangements that may affect how the Project is

	financed, operated, accessed, used and maintained, and how Project-related benefits, revenues, risks and responsibilities would be allocated among public, Inuit, private and third-party interests.
Information Request:	Please provide a consolidated description of the ownership, governance, financing, commercial-interest, user-access and benefit-allocation arrangements relevant to the Project. The response should identify arrangements, interests or relationships involving WKR, its affiliates, shareholders, directors, officers, lenders, major contractors, consultants, advisors, prospective users, public funders or other participating entities that relate to: (a) Project ownership, control, governance, financing or public funding; (b) land, water, mineral, transportation, port, road, access, procurement or other commercial interests that may be affected by the Project; (c) user access, tolls, tariffs, leases, wharfage, road-use fees, security requirements, priority-use arrangements or other Project revenues; (d) reasonably foreseeable induced projects, prospective users or other projects whose benefits, traffic, shipping, trucking, revenues or cumulative effects are considered in the Impact Statement; (e) procurement, construction, operation, maintenance, monitoring, mitigation or adaptive-management arrangements; and (f) preparation or review of baseline studies, economic modelling, traffic forecasts, cumulative-effects assessment, management plans or monitoring plans. For each arrangement, interest or relationship identified, please describe the parties involved, the nature of the arrangement or interest, the aspect of the Project or Impact Statement to which it relates, and how it has been reflected in the Impact Statement's assumptions, analysis, mitigation, monitoring, access rules, procurement approach or benefit-distribution discussion. Please also identify any other actual, potential or perceived conflict of interest or related-party interest relevant to the Board's assessment of the Project.

ON-09: Human Environment / Food Security - Community resupply, cost of living and pass-through assumptions

IR Source	Oceans North
IR No.	ON-09
IR Directed To:	West Kitikmeot Resources Corp. (Project proponent)
Subject:	Human Environment / Food Security - Community resupply, cost of living and pass-through assumptions
Reference:	Impact Statement, Volume 9, Sections 25 and 28; Project Fact Sheet.
Issue/Concern:	The Impact Statement identifies improved community resupply, supply-chain resilience, food security and reduced transport costs as potential Project benefits. However, the Impact Statement does not provide sufficient evidence showing how those savings would occur, which communities would benefit, or whether any savings would be passed through to residents.
Rationale:	Claims regarding food security, affordability and supply-chain resilience are material to the Project's asserted public benefits. NIRB and communities require the assumptions underlying those claims.
Information Request:	Please provide: (a) which communities are expected to experience reduced freight, food, fuel, construction or resupply costs; (b) whether goods would move through Grays Bay rather than existing marine or air routes; (c) last-mile transportation assumptions; (d) expected tolls, tariffs, port fees, handling charges and other costs affecting community resupply; (e) whether access for community resupply is guaranteed, discretionary or subject to user agreements; and (f) any quantitative estimate of expected cost savings by community and commodity type.

ON-10: Project Purpose and Need / Cumulative Effects - Dual-use assumptions

IR Source	Oceans North
IR No.	ON-10
IR Directed To:	West Kitikmeot Resources Corp. (Project proponent); Transport Canada; Canadian Coast Guard; Department of National Defence, as appropriate
Subject:	Project Purpose and Need / Cumulative Effects - Defence, Coast Guard, search-and-rescue, security and dual-use assumptions
Reference:	Impact Statement, Volume 8, Sections 21-23; Volume 9, Sections 27 and 28; Project Fact Sheet.
Issue/Concern:	The Impact Statement and Fact Sheet identify operations for the purposes of asserting sovereignty and security, Coast Guard activities, public use, and military uses as potential benefits or anticipated users, but the Impact Statement does not quantify those uses or explain how they were incorporated into the design of the project, nor how they were assessed, including potential impacts from vessel traffic, noise, spill-risk, safety, security and cumulative-effects analyses.
Rationale:	Dual-use/public-agency assumptions may materially affect Project purpose and need, design, traffic, cumulative effects, marine risk, community access and security restrictions.
Information Request:	Please identify whether uses by the Department of Defence, including the Canadian Coast Guard's operations, or other public-agency uses form part of the Project's purpose, need, design basis, traffic forecast, business case, or financing case. Please identify its inclusion within the cumulative-effects assessment. Please also provide: (a) expected vessel, aircraft and vehicle movements associated with those uses; (b) any required design changes, including airstrip, berthing, fuel, security, communications, warehousing or emergency-response infrastructure; (c) whether those users would pay fees or receive priority access; (d) whether security-related restrictions would affect public, community, harvester or commercial access; and (e) how these uses were included in effects predictions and mitigation.

ON-11: Project Purpose and Need / Alternatives - Public corridor model versus mine-user infrastructure model

IR Source	Oceans North
IR No.	ON-11
IR Directed To:	West Kitikmeot Resources Corp. (Project proponent)
Subject:	Project Purpose and Need / Alternatives - Public corridor model versus mine-user infrastructure model
Reference:	Impact Statement, Volume 2, Project Description and Alternatives; Volume 9, Sections 27-29.
Issue/Concern:	The Project is presented as public-benefit, multi-user infrastructure, but its economic case appears to depend substantially on reasonably foreseeable induced mineral developments. The Impact Statement does not provide a transparent comparison between GBRP and alternatives under which mine proponents or industrial users finance infrastructure required for their own projects.
Rationale:	An alternatives analysis is necessary to assess Project purpose, need, public/private benefit distribution, cumulative effects, public-funding risk and whether less impactful or differently financed alternatives are technically and economically feasible.
Information Request:	Please provide an alternatives analysis comparing the proposed Project against: (a) mine-specific private roads and/or port facilities financed by mine proponents or industrial users; (b) a jointly financed private industrial-access corridor funded by reasonably foreseeable induced project proponents;

	(c) a staged or modular version of the Project tied to confirmed user commitments, financing commitments and permitting status of induced developments; (d) continued seasonal marine resupply and/or winter-road access without construction of a permanent all-season road to Grays Bay; (e) a public-infrastructure model with regulated or capped access charges; (f) a private toll-road/port concession model; and (g) the no-project alternative. For each alternative, please provide capital cost, operating cost, maintenance cost, closure/decommissioning cost, revenue assumptions, public/private funding assumptions, traffic assumptions, user-fee assumptions, economic benefits, adverse ecosystemic and socio-economic effects, cumulative effects and reasons for rejection.
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ON-12: Project Purpose and Need - Reconciliation of prior public-sector financing concerns

IR Source	Oceans North
IR No.	ON-12
IR Directed To:	West Kitikmeot Resources Corp. (Project proponent) and, as applicable, Government of Canada/CIRNAC/Canada Infrastructure Bank West Kitikmeot Resources Corp., with respect to the current Project financing model, business case and public-benefit rationale; and Government of Canada, CIRNAC, Canada Infrastructure Bank and any other responsible public authority, with respect to any analysis, due diligence, funding assessment or risk assessment in their possession.
Subject:	Project Purpose and Need - Reconciliation of prior public-sector financing concerns
Reference:	Impact Statement, Volume 2, Project Description and Alternatives; Volume 9, Section 27; Project Fact Sheet; Government of Nunavut March 26, 2018 letter to the Kitikmeot Inuit Association regarding the Grays Bay Road and Port Project (attached as an appendix to this filing); Legislative Assembly of Nunavut Hansard, May 30, May 31 and June 6, 2018.
Issue/Concern:	Public records indicate that the Government of Nunavut withdrew from its prior role in the Grays Bay Road and Port Project after identifying concerns regarding the financing commitment required of the GN, implications for the GN's ability to pursue other needed infrastructure, debt-cap implications, and advice that mining companies benefitting from the Project could finance road construction themselves without negatively affecting mine profitability. The current Impact Statement presents the Project as public-benefit, multi-user infrastructure and relies on public-benefit claims, induced-development assumptions and user-pay access. However, the Impact Statement does not appear to reconcile the prior public-sector financing concerns with the Project's current public-benefit rationale, public-funding assumptions or risk-allocation model.
Rationale:	If the Project relies on public funding, public loans, guarantees, concessional financing, public-risk assumption, tolls, tariffs, user agreements or public-benefit claims, NIRB and the public require a clear explanation of whether and how the current business case addresses the prior public-sector concerns identified in the public record.
Information Request:	To WKR: (a) Please explain how the current Project financing model, business case and public-benefit rationale address the public-sector financing concerns identified in the public record, including concerns about public funding, opportunity cost, debt-cap implications, public risk, and whether mining companies or other industrial users could finance some or all of the infrastructure themselves. (b) Please identify and summarize any analysis WKR has prepared, received or relied upon that addresses those prior concerns, including the Government of Nunavut's 2018 withdrawal from its prior proponent role. To the Government of Canada, CIRNAC, Canada Infrastructure Bank and any other responsible public authority: (c) Please identify and summarize any analysis prepared, received or relied upon in relation to the current Project that addresses public funding, public loans, guarantees, concessional financing, public-risk allocation, user-pay revenues, induced mineral development, private-user financing, public/security uses, or the allocation of costs, benefits and risks among public, Inuit and private interests.

	(d) Please identify and summarize any analysis that addresses or revisits the Government of Nunavut's 2018 withdrawal from its prior proponent role or the public-sector financing concerns identified in the public record. (e) Please explain whether the authority has considered whether public funding, public loans, guarantees or concessional financing would subsidize private mineral development, create a precedent for public funding of future mine-access infrastructure in Nunavut, or could be replaced in whole or in part by financing from mining companies, exploration companies, prospective road or port users, or other industrial users benefitting from the Project. If WKR or a responsible public authority has not prepared, received, reviewed or relied upon information responsive to one or more of these requests, please state so expressly.
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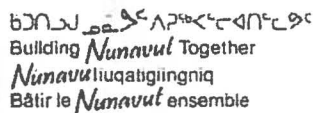
ON-13: Integration of additional marine environmental information during the Environmental Impact Statement review

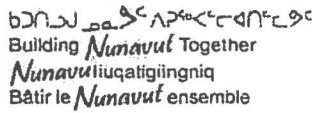
IR Source	Oceans North
IR No.	ON-13
IR Directed To:	Nunavut Impact Review Board (NIRB)
Subject:	Integration of additional marine environmental information during the Environmental Impact Statement review
Reference:	Final Impact Statement Guidelines – Sections 8.1.13 (Marine Wildlife and Habitat), 8.1.14 (Marine Transportation), Section 11 (Environmental Management and Monitoring), and Section 2 (Preparation and Review of the Impact Statement).
Issue/Concern:	The Final EIS Guidelines require the Proponent to characterize marine wildlife, underwater marine acoustics, Project-related shipping effects, mitigation measures, monitoring programs, and adaptive management. These assessments are based on the information available at the time the Impact Statement is prepared. However, additional information relevant to marine wildlife and underwater sound may become available during the course of the review through government research programs, Inuit organizations, community-based monitoring initiatives, independent scientific research, and other technical submissions. Given the evolving nature of Arctic marine science and long-term monitoring programs, additional information may assist NIRB in evaluating Project effects, uncertainty, mitigation effectiveness, and adaptive management measures.
Rationale:	A clear understanding of how additional scientific, Inuit Knowledge, community-based and regulatory information may be incorporated into the review process would assist participants in preparing technical submissions and would support a comprehensive assessment of potential Project effects on the marine environment.
Information Request:	Please describe how NIRB will consider additional marine environmental information that is submitted or otherwise becomes available during the Impact Statement review process, including information not generated directly by the Proponent but relevant to the assessment of Project effects, mitigation measures, monitoring or adaptive management.

ON-14: Marine Environment – Information required to improve confidence in predictions of marine mammal responses to Project-related underwater sound

IR Source	Oceans North
IR No.	ON-14
IR Directed To:	Fisheries and Oceans Canada (DFO)
Subject:	Marine Environment – Information required to improve confidence in predictions of marine mammal responses to Project-related underwater sound
Reference:	Impact Statement Volume 8, Section 23.2.2.3 (Regional Soundscape); Section 23.3.3 (Change in Behaviour Caused by Sensory Disturbance); Section 23.3.4 (Change in Mortality and/or Injury Risk); Section 23.5 (Mitigation and Monitoring); Wildlife Mitigation and Monitoring Plan; Final Impact Statement Guidelines Sections 8.1.13 (Marine Wildlife and Habitat), 8.1.14 (Marine Transportation), and Section 11 (Environmental Management and Monitoring).
Issue/Concern:	The Impact Statement identifies underwater sound generated during marine construction and vessel operations as a potential pathway through which Project activities may affect marine mammals. The

	assessment relies on acoustic modelling, source characterization, and generalized marine mammal hearing criteria to evaluate potential effects. DFO's scientific advice would assist NIRB in determining whether additional information should be developed during the Environmental Impact Statement process to improve confidence in predictions of marine mammal behavioural responses under Project-specific conditions.
Rationale:	The Final Impact Statement Guidelines require the Proponent to assess Project-related underwater marine acoustics, evaluate potential effects on marine wildlife, and characterize uncertainty. DFO's scientific advice regarding the information needed to improve confidence in predictions of marine mammal behavioural responses under Project-specific conditions would assist NIRB, the Proponent, Indigenous organizations, and other intervenors in evaluating whether the proposed assessment framework is sufficient to support informed decision-making.
Information Request:	Please identify any additional information that DFO considers important to improve confidence in predictions of marine mammal behavioural responses to Project-related underwater sound during the Impact Statement review process.





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