



NIRB File No.: 24XN038
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July 20, 2026

Gavin Law
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Sent via email: glaw@westkit.ca

**Re: Request for Responses to Information Request for the Grays Bay Road and Port Project
Proposal – Due August 19, 2026**

Dear West Kitikmeot Resources Corp. and Parties:

On May 6, 2026, the Nunavut Impact Review Board (NIRB or Board) invited Information Requests (IRs) regarding the technical review of the **Impact Statement** submitted by West Kitikmeot Resources Corp. for the **Grays Bay Road and Port Project Proposal**. On or before July 3, 2026,¹ the NIRB received IR submissions from the following parties.

Party	# of IRs	NIRB Doc. ID
Kitikmeot Inuit Association (KIA)	65	361929
Nunavut Tunngavik Inc. (NTI)	14	362147
Government of Nunavut (GN)	36	362118
Government of Canada (GoC) Including: Crown-Indigenous and Northern Relations Canada (CIRNAC) Environment and Climate Change Canada (ECCC) Fisheries and Oceans Canada (DFO) Health Canada (HC) Natural Resources Canada (NRCan) Transport Canada (TC)	123	362139
Kugluktuk Angoniatit Association (KAA)	70	361928
Kugluktuk Hunters and Trappers Organization (KHTO)	14	361927
Athabasca Denesuliné Néné Land Corporation (ADNLC)	17	362159

¹ Originally June 5, and extended to June 19 and later to July 3, 2026

Party	# of IRs	NIRB Doc. ID
Beverly and Qamanirjuaq Caribou Management Board (BQCMB)	19	362145
Caribou Guardians Coalition (CGC)	17	362343 362341
Deline Got'ine Government (DGG)	4	362144
Government of the Northwest Territories (GNWT)	19	362161
Gwich'in Tribal Council (GTC)	15	362110
Inuvialuit Game Council (IGC)	3	362146
Inuvialuit Regional Corporation (IRC)	4	362138
The Mackenzie Valley Environmental Impact Review Board (MVEIRB)	7	362218
Oceans North (ON)	14	362249
Th̕ch̕ Government (TG)	4	362211
Wildlife Conservation Society (WCS)	30	361947 361960
Yellowknives Dene First Nation (YDFN)	42	362148
Total	517	

The NIRB completed its review of the Information Requests received and determined which IRs are relevant to the Proponent or another responding party, relevant to the current stage of the Review process, and necessary to support parties' technical review of the **Grays Bay Road and Port, Impact Statement** and the subsequent development of technical review comments.

Of the IRs received:

- **517** are directed to West Kitikmeot Resources Corp. (the Proponent), and
- **41** are directed to other parties including the NIRB.

When preparing IR responses, the NIRB requires that the Proponent and other responding parties to:

- Identify the applicable IR number(s);
- Consult with the requesting party(ies) to ensure that the response provided meets expectations;
- Where multiple IRs identify the same or similar information requirements, one consolidated response may be used or cross-referencing provided; and
- Where the requested information or analysis cannot be provided, a clean explanation of why the information is not currently available and indicate when it will be provided or describe the alternative method that will be used to address the issue or concern.

Information Requests Directed to the Proponent

The NIRB requests that West Kitikmeot Resources Corp. respond to the IRs submitted by parties, except for those identified in **Appendix A** as not requiring a response at this stage of the Review.

The IRs in **Appendix A** appear to be outside the scope of information required for this phase of the Review and will be addressed through the technical review.

Information Requests Directed to Other Parties

The NIRB identified IRs directed to other parties, including the NIRB, and these IRs are listed in **Appendix B** with responding parties identified in the “Directed to” column. Each responding party should clearly identify the applicable IR number(s) in its response. The IRs not identified in **Appendix B** appear to be outside the scope of information required for this phase of the review and will be addressed in technical review.

NIRB Information Requests

The NIRB is also issuing **431** IRs to West Kitikmeot Resources Corp as set out in **Appendix C**.

The Board respectfully requests that West Kitikmeot Resources Corp. and the other responding parties review and respond to the IR submissions directed to them as directed through the IR submissions by **August 19, 2026**.

If you have any questions regarding the NIRB’s Review of the **Grays Bay Road and Port Project Proposal** or the Review process, please contact **Amir Pourmahabadian, Senior Impact Assessment Officer**, at apourmahabadian@nirb.ca.

Sincerely,



Kelli Gillard PAg, CTAJ
Manager, Impact Assessment
Nunavut Impact Review Board

Attachments: **Appendix A** – Information Requests Not Requiring Response at This Stage
 Appendix B – Information Requests Directed to Other Parties
 Appendix C- NIRB Information Requests Directed to West Kitikmeot Resources Corp

cc: Grays Bay Project Distribution List

Appendix A

Information Requests Not Requiring Response at This Stage

Party	IR #	Category
ADNLC	ADNLC-IR-11	Technical review comment
ADNLC	ADNLC-IR-17	Technical review comment
GN	GN IR 32	Technical review comment/recommendation
GN	GN IR 34	Technical review comment/recommendation
GoC	TC-IR 01	Technical review comment/recommendation
GoC	TC-IR 04	Technical review comment
GoC	ECCC-IR 48	Technical review comment
GoC	DFO-IR 43	Technical review comment
GoC	NRCan-IR 07	Technical review comment
GoC	N/A	Technical review comment
GoC	N/A	Technical review comment
GoC	N/A	Technical review comment
KHTO	9	Technical review comment
KHTO	12	Technical review comment/recommendation
KHTO	14	Technical review comment
KAAs	32	Technical review comment
KAAs	33	Technical review comment
KAAs	36	Technical review comment/recommendation
KAAs	37	Technical review comment
KAAs	38	Technical review comment/recommendation
KAAs	39	Technical review comment/recommendation
YKDFN	YKDFN IR #8	Technical review comment
YKDFN	YKDFN IR #19	Technical review comment/recommendation
GTC	GTC-10	Technical review comment
GTC	GTC-11	Technical review comment
NTI	NTI-9	Technical review comment

Appendix B

Information Requests Directed to Other Parties

Requesting Party	IR #	Directed To
GNWT	GNWT 18	Government of Nunavut
GNWT	GNWT 19	Nunavut Impact Review Board (NIRB)
GTC	GTC-01	Government of Canada, Government of the Northwest Territories, Joint Secretariat Inuvialuit Settlement Region, Tłıchǫ Government, Kativik Environmental Quality Commission, Kativik Environmental Advisory Committee, Nunavik Marine Region Impact Review Board
GTC	GTC-02	Government of Canada, Government of the Northwest Territories, Province of Quebec
GTC	GTC-05	Regulatory Authorities responsible for managing Project Certificates and regulatory permits and licenses associated with the Project
GTC	GTC-14	Government of Canada; Government of Nunavut (GN); Kitikmeot Inuit Association (KIA)
GTC	GTC-15	Government of Canada; Government of Nunavut (GN); Kitikmeot Inuit Association (KIA)
CGC	IR #1	NIRB
KAA	KAA #1	Nunavut Planning Commission
KHTO	1-13 (except for 9)	NIRB
ON	ON-12	Government of Canada, CIRNAC, Canada Infrastructure Bank and any other responsible public authority
YKDFN	YKDFN IR #2	Kitikmeot Inuit Association (KIA)
YKDFN	YKDFN IR #4	Government of Nunavut (GN), Government of the Northwest Territories (GNWT), Mackenzie Valley Environmental Impact Review Board (MVEIRB)
YKDFN	YKDFN IR #11	Government of Nunavut (GN); Kitikmeot Inuit Association (KIA)
YKDFN	YKDFN IR #17	Government of Nunavut (GN); Kitikmeot Inuit Association (KIA)
YKDFN	YKDFN IR #36	NIRB, MVEIRB

Appendix C

NIRB Information Requests Directed to West Kitikmeot Resources Corp.

IR Source	IR #	IR Directed To	Subject	IS Reference Reviewed	Reviewer Comments / Reasoning	Missing Information / Gap	Information Requests / IR
NIRB	1.	West Kitikmeot Resources Corp.	Effects assessment / positive effects / traceability	Vol. 1, Fact Sheet; Vol. 1 Executive Summary; Vol. 1 Main Document, s. MD.1.5 Project Overview and Location, s. MD.5–MD.10 effects summaries; Vols. 5–10 discipline assessments.	The IS contains a broad project description and discipline-specific summaries of predicted effects. However, the treatment of positive effects is not equivalent to adverse effects in several human environment sections. Some benefits are stated as expected or beneficial but are not consistently characterized using the same residual-effects criteria used for adverse effects.	No consolidated project-wide table links each project component/activity to both positive and negative biophysical and socio-economic consequences, affected receptors, residual effects criteria, mitigation/enhancement, monitoring, and significance.	Provide a consolidated project-effects register that lists each project component and activity; identifies positive and negative biophysical, socio-economic, cultural, health, well-being and Inuit rights-related consequences; characterizes each effect using magnitude, duration, geographic extent, reversibility, frequency, likelihood/certainty and significance; and identifies the mitigation, enhancement, monitoring and follow-up measure supporting each conclusion.
NIRB	2.	West Kitikmeot Resources Corp.	Systems assessment / methodology	Vol. 4, s. 9 Effects Assessment Methodology; Vol. 10, s. 31 Holistic Assessment; Vol. 10 Volume Summary.	The IS is organized by discipline and includes a separate holistic assessment. This helps reviewers locate technical material, but the record does not consistently show how system interactions changed VC-level predictions, mitigation, or significance conclusions.	Cross-VC pathways are described at a high level but are not consistently carried through to residual effects and significance determinations.	Provide a cross-VC interaction matrix that identifies each interaction pathway among atmospheric, terrestrial, freshwater, marine, human health, TLMRU, food security, infrastructure, economy, and cultural components; explains whether the interaction was carried into residual-effects characterization; identifies where interactions changed mitigation, monitoring or significance conclusions; and explains why any documented interaction was not carried forward.
NIRB	3.	West Kitikmeot Resources Corp.	Inuit Knowledge / traceability	Vol. 1, Fact Sheet and Executive Summary; Vol. 2, s. 2.1.5 Public Engagement and Inuit Qaujimajatuqangit; Vol. 3, s. 4–6; Vol. 11, s. 37 and draft monitoring/management plans.	The IS states that Inuit, Indigenous and Community Knowledge was reviewed, considered and integrated where appropriate. The record demonstrates use of knowledge in baseline descriptions and some mitigation, but it does not provide a traceable account showing how each major knowledge input affected design, operations, monitoring, closure, baseline or final conclusions.	No complete knowledge-integration matrix links knowledge inputs to specific changes in design, effects analysis, mitigation, monitoring, significance or closure/post-closure planning.	Provide an Inuit, Indigenous and Community Knowledge integration matrix that identifies the knowledge source or engagement source, respecting confidentiality; the issue or value raised; the project component or VC affected; how the information changed design, baseline, effects assessment, mitigation, monitoring, adaptive management or significance; where the information was not adopted and why; and how the information will continue to inform operations, monitoring, care and maintenance, closure and post-closure.

IR Source	IR #	IR Directed To	Subject	IS Reference Reviewed	Reviewer Comments / Reasoning	Missing Information / Gap	Information Requests / IR
NIRB	4.	West Kitikmeot Resources Corp.	Mitigation / monitoring / commitments	Vol. 1 Appendix B Mitigations and Commitments; VC mitigation sections in Vols. 5–10; Vol. 11 Management Plans and appendices.	The IS includes many mitigation commitments and management plans. However, several measures are embedded in narrative text or draft plans, and several management plans remain preliminary, with details such as thresholds, locations, responsibilities, monitoring design and adaptive actions not finalized.	Commitments are not fully consolidated into an auditable register with implementation timing, responsible party, measurable performance indicators, thresholds, reporting and adaptive management actions.	Provide a consolidated mitigation, enhancement and commitments register that includes each measure; affected VC; project phase; implementation timing; responsible party; performance indicator; monitoring method; threshold/action level; reporting frequency; adaptive response if the measure is ineffective; and cross-reference to the plan or permit where the measure will be enforceable.
NIRB	5.	West Kitikmeot Resources Corp.	Data sufficiency / uncertainty	Vols. 5–9 VC baseline and effects assessments; Vol. 10 cumulative/transboundary/accident assessments; Vol. 11 management plans.	The IS contains extensive baseline and effects material. Remaining technical-review limitations arise where conclusions depend on future detailed design, future permitting, draft management plans, incomplete monitoring thresholds, future development assumptions, or closure/post-closure arrangements.	No consolidated data-gap and design-uncertainty register identifies which conclusions depend on future data, future design, or future management-plan completion.	Provide a data-gap and design-uncertainty register by VC and project component that identifies missing baseline or design information; the effect conclusion potentially affected; the required additional study, survey, model update or plan completion; timing for completion; how results will be reviewed before construction; and whether the residual-effects or significance conclusion may change.
NIRB	6.	West Kitikmeot Resources Corp.	Holistic assessment	Vol. 4, s. 9 methodology; Vol. 10, s. 31 Holistic Assessment.	The IS includes a holistic assessment framework, but it remains partly separate from the VC-specific assessments. A senior review requires a clear line of sight from holistic system findings to revised VC conclusions, mitigation, monitoring and significance.	The holistic assessment is not supported by a decision record showing which system-level findings changed the assessment or why they did not.	Provide a holistic-assessment decision table that identifies each system-level concern, the VCs affected, the evidence base, the resulting assessment conclusion, whether the VC-level conclusion changed, and the specific mitigation or monitoring response.
NIRB	7.	West Kitikmeot Resources Corp.	Inuit Knowledge / conclusions	Vol. 3, s. 4 Approaches for Gathering Inuit Knowledge, Indigenous Knowledge, and Community Knowledge; s. 5 Integrating Values and Perspectives.	Volume 3 describes the sources and general integration approach, including the NTKP-derived knowledge source. The description is useful, but it does not fully show how knowledge was evaluated for applicability, how conflicting information was treated, or how conclusions changed as a result.	Insufficient traceability between knowledge inputs, interpretation/validation steps, and final technical conclusions.	Provide a knowledge-evaluation and conclusion-traceability table identifying each key knowledge input; method of collection; validation or permission status; applicability to project component, VC, season or geography; whether the input supported, modified or conflicted with western-science evidence; and how the final conclusion was reached.

IR Source	IR #	IR Directed To	Subject	IS Reference Reviewed	Reviewer Comments / Reasoning	Missing Information / Gap	Information Requests / IR
NIRB	8.	West Kitikmeot Resources Corp.	Public engagement / transboundary	Vol. 3, s. 6 Public Engagement; Appendix 6B Engagement Plan; Appendix 6C Current Engagement Meetings; Appendix 6E Historical Engagement Activities; Vol. 10 Transboundary Impacts.	The IS documents extensive Kitikmeot engagement and identifies transboundary considerations. However, the materials reviewed do not provide a complete, consolidated matrix showing all potentially affected communities and organizations, engagement status, issues raised, responses, and unresolved matters, including outside Nunavut.	Transboundary and adjacent-jurisdiction engagement is not as auditable as Kitikmeot engagement; unresolved concerns are not fully cross-walked to project design and mitigation.	Provide a complete engagement coverage matrix for Nunavut and transboundary communities/organizations showing who was contacted; dates and methods; topics discussed; issues raised; commitments made; whether concerns remain unresolved; how each issue changed or did not change design, assessment, mitigation or monitoring; and the planned engagement during technical review and plan finalization.
NIRB	9.	West Kitikmeot Resources Corp.	Engagement / accountability	Vol. 3, s. 6 Public Engagement; Table 6.2 Summary of Key Issues Raised During Engagement; Appendix 6A workshop summaries; Appendix 6B engagement plan.	The IS includes summaries of engagement and key issues. For technical review, NIRB and parties need a more direct issue-response register that records the origin of each concern, the proponent response, whether the response changed the project or assessment, and how follow-up will occur.	The engagement record does not fully demonstrate issue closure, rationale where input was not adopted, or feedback loops back to the originating community or organization.	Provide a consolidated issue-response register including issue ID; source/community/organization; date and method of engagement; issue description; affected VC or project component; proponent response; design, mitigation, monitoring or assessment change made; rationale where no change was made; status as open/closed; and planned follow-up.
NIRB	10.	West Kitikmeot Resources Corp.	Engagement / methods	Vol. 2, s. 2.4 Alternatives; Vol. 3, s. 5–6; Vol. 4, s. 9 VC selection and assessment methods; Vol. 11 draft management and monitoring plans.	The IS states that engagement influenced project planning and assessment. However, the role of engagement in determining quantitative/qualitative thresholds, alternatives screening, significance criteria and monitoring design is not consistently documented.	No systematic table shows how public input affected alternatives scoring, VC indicators, significance criteria, monitoring indicators or thresholds.	Provide a public-engagement influence table showing how engagement contributed to project scope, design, alternatives, baseline, VC selection, significance criteria, mitigation, monitoring, thresholds and management plans; identify where public input did not change the assessment and provide rationale.
NIRB	11.	West Kitikmeot Resources Corp.	Precautionary principle / risk	Vol. 1 Main Document, s. MD.2.1.1 Precautionary Principle; Vol. 2, s. 2.1.3 Precautionary Principle; VC uncertainty sections in Vols. 5–9.	The IS describes the precautionary principle and states that uncertainty, monitoring and adaptive management are addressed within VC sections. A senior review requires a consolidated record of irreversible or potentially serious effects and the specific precautionary measures applied.	There is no project-wide precautionary-risk register linking serious/irreversible risk pathways to assumptions, conservative design choices, mitigation, monitoring, and action thresholds.	Provide a precautionary-risk register identifying all potential serious or irreversible effects; affected VC/receptor; uncertainty source; conservative assumption or design measure applied; mitigation; monitoring indicator; action threshold; adaptive management response; and residual risk after mitigation.

IR Source	IR #	IR Directed To	Subject	IS Reference Reviewed	Reviewer Comments / Reasoning	Missing Information / Gap	Information Requests / IR
NIRB	12.	West Kitikmeot Resources Corp.	Data gaps / uncertainty	VC prediction confidence and uncertainty sections in Vols. 5–9; Vol. 11 management plans.	Uncertainty is addressed in many VC sections. However, data gaps are dispersed across volumes and not consolidated with actions, responsibilities and decision points. Several plan details are deferred to later design or permitting.	No single data-gap register identifies the implications of each gap for NIRB's ability to assess effects before a project recommendation.	Provide a consolidated technical and Inuit Knowledge data-gap register with gap description; affected guideline requirement; affected VC or project component; significance of the gap for effects prediction; proposed action to close or manage the gap; timing; responsible party; and whether the gap must be closed before construction, before operation, or through follow-up.
NIRB	13.	West Kitikmeot Resources Corp.	Sustainability / community-defined indicators	Vol. 1 Executive Summary; Vol. 2, s. 2.1.2 Climate Change and Sustainability; Vol. 3, s. 5–6; Vol. 9 Employment, Economy, Food Security, Health and Well-being sections.	The IS discusses sustainability themes and anticipated benefits. However, it does not provide a transparent sustainability framework that shows how affected people defined sustainability and how the Project is measured against those definitions over time.	No sustainability scorecard or matrix links community-defined sustainability values to indicators, trade-offs, intergenerational equity, ecosystem integrity, food security, cultural continuity and durable benefits.	Provide a sustainability assessment matrix that identifies sustainability values expressed by affected communities, Inuit organizations, Indigenous groups and governments; maps those values to measurable indicators; evaluates Project contributions and trade-offs; identifies enhancement measures; and explains how progress will be monitored and reported through construction, operations, care and maintenance, closure and post-closure.
NIRB	14.	West Kitikmeot Resources Corp.	Engagement / review process	Vol. 3, s. 6 Public Engagement; Appendix 6B Engagement Plan; Appendix 6C current engagement; Appendix 6E historical engagement; Vol. 10 Transboundary Impacts.	Engagement is documented, but the technical review requires a clearer engagement completeness record, especially for transboundary organizations and for continuing engagement during review and plan finalization.	Engagement status, issue closure, and planned technical-review engagement are not consolidated by organization or jurisdiction.	Provide a complete consultation and engagement status table listing all potentially affected communities, governments, Inuit organizations, Indigenous organizations, departments and agencies; engagement dates and topics; outstanding information needs; unresolved concerns; commitments made; and scheduled follow-up during technical review, management-plan finalization and pre-construction.
NIRB	15.	West Kitikmeot Resources Corp.	Completeness / methodology	Vol. 1 Main Document; Vol. 2 Project Components and Activities and Alternatives; Vols. 5–10 discipline assessments; Vol. 11 Management Plans.	Most required categories are present somewhere in the IS. Key adequacy limitations include future design uncertainty, incomplete closure/restoration planning for permanent infrastructure, incomplete compensation/offsetting detail where applicable, and incomplete final monitoring/management-plan details.	The IS does not provide a single completeness crosswalk demonstrating which Article 12/NuPPAA information elements are fully met, partially met, deferred, or not applicable.	Provide an Article 12/NuPPAA completeness crosswalk that identifies each required information element; exact IS reference; adequacy status; deferred information; rationale for any not-applicable item; and the specific schedule and review mechanism for information to be provided after IS submission.

IR Source	IR #	IR Directed To	Subject	IS Reference Reviewed	Reviewer Comments / Reasoning	Missing Information / Gap	Information Requests / IR
NIRB	16.	West Kitikmeot Resources Corp.	VC selection / methodology	Vol. 4, s. 9 Effects Assessment Methodology; Vol. 3, s. 4–6; VC assessment sections in Vols. 5–9.	The IS describes general VC selection and methodological structure. However, it does not always provide transparent, section-specific rationale for why party-requested VCs or indicators were included, excluded, combined or treated through another VC.	No complete VC/indicator selection record identifies party requests, inclusion/exclusion rationale, and differences in conclusions between knowledge systems.	Provide a VC and indicator selection record listing all VCs, subcomponents and indicators considered; source of each request or issue; whether it was included, excluded or combined; rationale; applicable knowledge source; and implications for effects assessment, cumulative effects, transboundary effects and monitoring.
NIRB	17.	West Kitikmeot Resources Corp.	Baseline / climate / closure	Baseline sections in Vols. 5–9; Vol. 5 Climate; Vol. 10 Effects of the Environment; Vol. 2 Project Phases; Vol. 11 Progressive Reclamation Plan (Draft).	Baseline sections are extensive and climate change is addressed. However, the Project is described as permanent infrastructure with operations in perpetuity, and closure/post-closure treatment is limited for permanent components. This limits assessment of long-term baseline change, abandonment, transfer or reduced-operation scenarios.	Closure, post-closure and long-term stewardship scenarios for permanent infrastructure are not fully assessed against changing environmental baselines.	Provide a life-of-project baseline-change addendum covering construction, operations, reduced operation, care and maintenance, closure/decommissioning, reclamation and post-closure scenarios; include climate change, permafrost change, hydrology, marine conditions, wildlife and socio-economic change; and identify whether effects predictions or mitigation require revision.
NIRB	18.	West Kitikmeot Resources Corp.	Knowledge reconciliation / uncertainty	Vol. 3, s. 4–6; VC-specific sections discussing influence of Inuit, Indigenous and Community Knowledge in Vols. 5–9.	The IS recognizes different knowledge sources and often describes Inuit Knowledge influence within VC sections. It does not provide a consolidated disagreement/reconciliation record for cases where knowledge systems differ or where community concerns remain unresolved.	No reconciliation table documents conflicting conclusions, unresolved concerns, or plans to address differences through additional analysis, mitigation, monitoring or engagement.	Provide a knowledge-reconciliation table identifying each instance where Inuit, Indigenous or Community Knowledge differs from scientific/engineering conclusions; describe the evidence from each knowledge source; state the Proponent's conclusion and rationale; identify remaining concerns; and provide the plan to address the difference through further analysis, mitigation, monitoring or follow-up engagement.
NIRB	19.	West Kitikmeot Resources Corp.	Methods / sampling / QA-QC	Technical appendices and baseline/effects sections across Vols. 5–9; Vol. 1 Appendix A concordance examples for VC assessments.	Many discipline sections provide methods and supporting appendices. However, the IS does not provide a consistent cross-VC sampling and analysis summary demonstrating that all sampled datasets include variability measures, sample-size justification, QA/QC and statistical/model sensitivity information.	Reviewers must search across thousands of pages to determine whether every sampled dataset meets the guideline; the concordance table uses representative examples for recurring VC requirements.	Provide a cross-VC sampling and analysis appendix listing every sampled dataset used in the IS; objective; location; timing; sample size and rationale; variability/dispersion statistics; QA/QC; experimental or analytical controls; laboratory methods; statistical or model assumptions; sensitivity analysis; limitations; and exact reference to the source appendix/table/figure.

IR Source	IR #	IR Directed To	Subject	IS Reference Reviewed	Reviewer Comments / Reasoning	Missing Information / Gap	Information Requests / IR
NIRB	20.	West Kitikmeot Resources Corp.	Knowledge protocols / ethics	Vol. 3, s. 4.1–4.3 and s. 4.2 Managing Confidential Information; Vol. 3 Appendices 6A–6E.	The IS describes general protocols and confidentiality considerations. For technical review, the Proponent should demonstrate, without disclosing confidential information, the verification and permission status for the key knowledge relied upon in conclusions.	No non-confidential verification/permission status table is provided for key knowledge inputs used in assessment conclusions.	Provide a non-confidential protocol compliance table identifying each knowledge dataset or engagement source used; collection protocol; confidentiality restrictions; knowledge-holder or organization involvement in interpretation; verification method; permission to use status; limitations on use; and affected IS conclusions.
NIRB	21.	West Kitikmeot Resources Corp.	Documentation / criteria / thresholds	Vol. 4, s. 9 assessment criteria and significance framework; VC-specific methods in Vols. 5–9; Vol. 11 draft management plans.	Assessment criteria are described in Volume 4 and VC sections. However, thresholds and action levels in monitoring/management plans are not consistently finalized, and the relative importance of criteria is not always explicit where professional judgement is used.	Unclear criteria weighting and incomplete thresholds reduce transparency of significance and adaptive management conclusions.	Provide a criteria and thresholds addendum that identifies, for each VC, the criteria used; definitions of rating categories; relative importance or weighting; quantitative thresholds where available; qualitative judgement basis where thresholds are unavailable; monitoring thresholds; action levels; and supporting literature or knowledge source.
NIRB	22.	West Kitikmeot Resources Corp.	Inuit Knowledge / methodology	Vol. 3, s. 5 Integrating Inuit, Indigenous, and Community Values and Perspectives; Vol. 4, s. 9 methodology; Vol. 11 monitoring plans.	The IS states that Inuit Knowledge influenced the assessment. The reviewer cannot consistently verify how qualitative, place-based or culturally defined observations were converted into design criteria, thresholds, monitoring indicators or significance conclusions.	No explicit method is provided for translating qualitative/culturally defined observations into assessment criteria and monitoring requirements.	Provide a methods addendum explaining how qualitative Inuit observations and culturally defined indicators were interpreted, protected, validated, coded or categorized, incorporated into VC criteria, and used to define mitigation, thresholds, monitoring indicators and final conclusions.
NIRB	23.	West Kitikmeot Resources Corp.	Existing information / lessons learned	Baseline and references in Vols. 5–9; Vol. 3 regional historical overview; Vol. 10 cumulative effects assessment.	The IS uses extensive existing information, but it does not provide a consolidated lessons-learned analysis showing how experience from comparable Arctic roads, ports, mines, shipping projects or monitoring programs shaped design, mitigation and adaptive management.	Existing information is cited, but the practical lessons drawn from comparable projects are not systematically documented.	Provide a lessons-learned matrix for comparable Arctic/sub-Arctic road, port, marine shipping, mining-access and infrastructure projects; identify source project/study; relevance to GBRP; observed issue or mitigation performance; lesson learned; how it was incorporated into design, mitigation, monitoring or emergency response; and where it is reflected in the IS.

IR Source	IR #	IR Directed To	Subject	IS Reference Reviewed	Reviewer Comments / Reasoning	Missing Information / Gap	Information Requests / IR
NIRB	24.	West Kitikmeot Resources Corp.	Existing Knowledge / applicability	Vol. 3, s. 4.1 Inuit Knowledge; description of Kitikmiut Knowledge / NTKP source; Vol. 3, s. 5 integration.	The IS identifies the NTKP-derived Kitikmiut Knowledge source and KIA role. A reviewer still needs a non-confidential applicability record showing how older database information was confirmed as applicable to current project design, footprint, timing and conditions.	Applicability review of database knowledge is not summarized by topic, geography, season and current project component.	Provide a database-knowledge applicability table identifying each dataset/source; original collection period; geographic and seasonal coverage; project component or VC to which it was applied; KIA/knowledge-holder input on applicability; limitations; and whether additional engagement or validation is required.
NIRB	25.	West Kitikmeot Resources Corp.	AI disclosure / translation	Vol. 1 translated-content disclaimer; translated summary sections; AI disclosure identifying Microsoft Bing Translator, ImTranslator and Microsoft Copilot for interim translation.	The IS discloses AI-assisted/machine translation tools and states AI was not used for technical assessments. However, the disclosure does not fully identify affected sections, input/output validation, responsible qualified reviewers, or ethical safeguards.	AI disclosure lacks section-level inventory, reviewer names/roles/qualifications, validation status, QA/QC results, and privacy/bias/security safeguards.	Provide a complete AI-use disclosure table identifying each AI tool; every affected section/component; purpose and method of use; inputs and outputs reviewed; responsible reviewer names/roles/professional designations; validation procedures and dates; corrections made; and safeguards for privacy, bias, security and output verification.
NIRB	26.	West Kitikmeot Resources Corp.	Translation / public participation	Vol. 1 disclaimer on translated content; Vol. 1/summary translated materials.	The IS states that machine translations were used for timely submission and that human translations were commissioned. Because translated materials support public engagement and informed participation, interim machine-translated materials should not be relied on without a clear validation and replacement record.	Final human-verified translations and change log from interim to verified translations are not provided in the reviewed record.	Submit final human-verified translations in English, French, Inuinnaqtun and Inuktitut for all required summaries and main-document materials; provide translator/reviewer qualifications; identify all sections replaced; provide a change log of substantive corrections from interim machine translation to final text; and confirm whether any technical conclusions, mitigation commitments or community-facing descriptions changed.

IR Source	IR #	IR Directed To	Subject	IS Reference Reviewed	Reviewer Comments / Reasoning	Missing Information / Gap	Information Requests / IR
NIRB	27.	West Kitikmeot Resources Corp.	Statutory requirements / completeness	Vol. 1 Main Document, MD.1 Introduction, pp. MD-1–MD-2; Vol. 1 Appendix A Concordance Table; Vols. 2–11 as supporting volumes.	The IS is structured into a main document and thematic/supporting volumes that broadly address project description, effects assessment, cumulative effects, accidents/malfunctions, transboundary effects, and management plans. However, technical review requires direct traceability between each statutory/guideline requirement and the specific evidence supporting the assessment conclusions. Some requirements are addressed across multiple volumes or deferred to future design/permitting/management-plan development.	No single auditable index shows, requirement-by-requirement, where each statutory information requirement is fully addressed and where information is deferred. This creates uncertainty for reviewers in confirming completeness.	Provide a statutory requirements crosswalk that maps each Nunavut Agreement Article 12.5.2 and NuPPAA s. 101(3) requirement to the exact IS volume, section, table, figure, appendix, and page range. Identify requirements that rely on future design, permitting, or management-plan completion, and provide a schedule for closing each gap.
NIRB	28.	West Kitikmeot Resources Corp.	Concordance / traceability	Vol. 1 Appendix A Concordance Table, pp. A-1 onward; Vol. 1 MD.1 Introduction, p. MD-1.	A concordance table is provided. However, it frequently uses representative examples for requirements that apply across multiple valued components and volumes. This approach is not sufficient for direct navigation or for confirming that each guideline requirement has been addressed for every applicable discipline, phase, and project component.	Representative examples do not demonstrate full conformance for all VCs, plans, and appendices. Several references are broad and do not provide complete page-level traceability.	Submit a revised concordance table that: 1) lists every guideline requirement separately; 2) provides all applicable IS volume, section, subsection, table, figure, appendix, and page references; 3) identifies where requirements apply across multiple VCs and provides references for each VC; 4) clearly flags partially addressed, not applicable, and deferred requirements; and 5) includes hyperlinks or bookmarks in the electronic PDF where feasible.

IR Source	IR #	IR Directed To	Subject	IS Reference Reviewed	Reviewer Comments / Reasoning	Missing Information / Gap	Information Requests / IR
NIRB	29.	West Kitikmeot Resources Corp.	Standalone document / deferred information	Vol. 1 MD.1 Introduction, pp. MD-1–MD-2; Vol. 1 MD sections summarizing VCs; Vols. 2–11 supporting volumes.	Volume 1 provides a summary of the Project and the main assessment findings, and the supporting volumes provide discipline-specific detail. The structure is generally consistent with the guideline. However, some of the most important supporting information, including plan thresholds, monitoring locations, care and maintenance details, final closure/stewardship approach, and final design-dependent assumptions, is either incomplete or deferred.	The main document cannot be fully stand-alone where conclusions depend on future design or management-plan content not yet provided.	Provide a main-document addendum or navigation table that links each key residual-effect and significance conclusion to the specific supporting baseline data, modelling, mitigation, monitoring, and management-plan commitments. For any conclusion relying on future design or plan completion, identify the missing input and explain whether the conclusion could change once that information is available.
NIRB	30.	West Kitikmeot Resources Corp.	Index / document navigation	Vol. 1 Table of Contents, List of Tables, List of Figures, Abbreviations; Vol. 1 Appendix A Concordance Table.	The IS contains tables of contents and lists of tables and figures. The concordance table also provides some navigation. However, the submission does not appear to provide a comprehensive subject index covering all key subjects across volumes by volume, section, subsection, and page.	A subject index is important because the IS is large and key topics such as caribou access controls, future development, DFO offsetting, water crossings, spill response, and Inuit Knowledge integration are distributed across several volumes.	Provide a consolidated subject index for the full IS that includes key topics, project components, VCs, management plans, technical appendices, and cross-cutting issues. The index should provide exact volume, section, subsection, table/figure/appendix, and page references.
NIRB	31.	West Kitikmeot Resources Corp.	Maps / geospatial data	Vol. 1 Figure MD.1.1 Project Overview, pp. MD-6 onward; Vol. 2 Figure 1.3 Project Overview, Figure 1.4 Project Location; Vol. 2 Project Overview, pp. 1-13–1-18.	The IS includes multiple maps and figures, and the overview figures identify WGS 1984 UTM Zone 12N and map scales. These are useful for orientation. However, reviewers also require geospatial data and consistent map layers to overlay Project components with land tenure, waterbodies, habitat, harvesting areas, archaeological constraints, and sensitive receptors.	The PDFs do not confirm that GIS files, layer metadata, and complete map packages were provided for technical review. Several maps provide context but not enough spatial detail to verify effects or mitigation at component scale.	Provide a geospatial data package for technical review, including Project Development Area boundaries, road alignment, port components, aerodrome, camps, quarries, watercourse crossings, winter roads, land tenure, sensitive environmental features, cultural/heritage constraints, and study-area boundaries. Include datum/projection, metadata, data source, date, and version-control information.

IR Source	IR #	IR Directed To	Subject	IS Reference Reviewed	Reviewer Comments / Reasoning	Missing Information / Gap	Information Requests / IR
NIRB	32.	West Kitikmeot Resources Corp.	Glossary / plain language	Vol. 1 Abbreviations, pp. MD-xx–MD-xxii; volume-specific abbreviation sections.	The IS provides abbreviations and acronyms. The guideline, however, calls for a plain-language glossary of technical words as well as acronyms and abbreviations. A list of acronyms is not the same as an accessible glossary explaining technical assessment terms, modelling terms, regulatory concepts, Inuit Knowledge terminology, and management-plan terminology.	Plain-language definitions are needed for public and technical users to understand terms such as residual effects, significance, HADD, RFI, ZOI, TARP, mixing zone, adaptive management, harmful alteration, and other terms central to the assessment.	Provide a plain-language glossary for the full IS. The glossary should include technical, regulatory, modelling, mitigation, monitoring, and Inuit Knowledge-related terms used across all volumes. Provide the glossary in the languages required by Section 3.5 for summaries and main-document materials.
NIRB	33.	West Kitikmeot Resources Corp.	PDF accessibility / data usability	Uploaded PDF volumes 1–11; Vol. 1 Appendix A; Vol. 1 main document and supporting volumes.	The uploaded PDFs are searchable, and text can generally be extracted, which supports technical review. However, some extracted map and table content is difficult to read or interpret outside the visual PDF context, and some figures require accompanying data files for full review.	Searchability alone does not provide the data behind maps, models, and large tables. For a northern review process, file size, registry accessibility, and data-download usability also matter.	Confirm that all PDFs submitted to the NIRB Public Registry are searchable, copy-enabled, not password restricted, and optimized for low-bandwidth access. Provide separate machine-readable files for large tables, commitments registers, GIS layers, monitoring locations, model inputs/outputs, and map data.
NIRB	34.	West Kitikmeot Resources Corp.	Main document / residual-effects summary	Vol. 1 MD.1 Introduction, pp. MD-1–MD-6; Vol. 1 Executive Summary, pp. ES-1 onward; Vol. 1 MD.6–MD.10 summaries.	Volume 1 provides a useful high-level summary and includes key maps and conclusions. It is not fully sufficient on its own for technical review because some conclusions are dependent on detailed supporting volumes and incomplete or future management plans. In addition, some positive socio-economic effects are described as benefits but are not assessed with the same level of effect characterization as adverse effects.	The main document does not consistently show the evidentiary chain between baseline, predicted change, mitigation, residual effects, significance, and follow-up for each major conclusion.	Provide a main-document residual-effects summary table for each VC that includes baseline condition, predicted change, effect pathway, mitigation/enhancement measures, residual effect, significance, confidence, key uncertainty, follow-up/monitoring, and source volume/page references. Include positive and adverse residual effects.

IR Source	IR #	IR Directed To	Subject	IS Reference Reviewed	Reviewer Comments / Reasoning	Missing Information / Gap	Information Requests / IR
NIRB	35.	West Kitikmeot Resources Corp.	VC summary / uncertainty	Vol. 1 MD.6 Ecosystemic Environment summary; Vol. 1 MD.9 Human Environment summary; Vol. 10 Additional Assessments; Vol. 11 Management Plans.	The main document summarizes each VC and cross-cutting assessment. The limitation is that the summary sometimes relies on statements that effects are not significant after mitigation without giving enough detail in the main document on uncertainty, residual effect magnitude, benefit distribution, and the role of incomplete management plans.	A complete VC-by-VC summary of uncertainty, confidence, adaptive management triggers, and monitoring commitments is not consistently presented in the main document.	Provide a VC summary addendum that identifies for each VC: 1) residual effect conclusion; 2) significance rationale; 3) confidence and uncertainty; 4) incomplete design or plan dependencies; 5) key mitigation measures; 6) monitoring indicators and thresholds; and 7) cumulative and transboundary effect implications.
NIRB	36.	West Kitikmeot Resources Corp.	Follow-up / monitoring	Vol. 1 MD.11 Management Plans summary; Vol. 11 Environmental Management System and Management Plans.	The IS provides a management-plan volume and a summary of management plans. However, several plans are preliminary, draft, or include placeholders for monitoring design, thresholds, adaptive responses, roles, and reporting. Where the effects assessment relies on these plans, the information is not yet complete enough for a technical reviewer to confirm that mitigation and follow-up will be effective.	The main document does not provide a complete follow-up, and monitoring commitments register with indicators, thresholds, schedules, accountable parties, reporting, and adaptive actions.	Provide a consolidated follow-up and monitoring register covering all VCs and management plans. Include monitoring objective, indicator, method, location, frequency, duration, threshold/action level, responsible party, reporting recipient, adaptive-management response, and link to the residual effect being verified.
NIRB	37.	West Kitikmeot Resources Corp.	Translation / public participation	Vol. 1 Table of Contents showing English, Inuinnaqtun, Inuktitut, and French Non-Technical Summary/Executive Summary sections; Vol. 1 machine-translation disclaimer.	The submission includes translated sections, but the IS discloses that some translated sections were produced using machine translation and that human-translated versions were commissioned and would replace the interim text. This is not adequate as final review material because public understanding and participation depend on accurate translations.	Final human-verified translations, translator/validator qualifications, QA/QC records, and a change log between machine-translated and verified versions are missing.	Provide final human-translated and validated versions of the main document, thematic volume summaries, Executive Summary, and Non-Technical Summary in English, French, Inuinnaqtun, and Inuktitut. Include translator/reviewer qualifications, QA/QC procedures, validation dates, and a change log identifying any substantive corrections from interim machine translations.

IR Source	IR #	IR Directed To	Subject	IS Reference Reviewed	Reviewer Comments / Reasoning	Missing Information / Gap	Information Requests / IR
NIRB	38.	West Kitikmeot Resources Corp.	Place names / maps	Vol. 2 Regional Context, p. 1-4, referring to Oalik Tagiuga, Kogloктоakyok, Napaktolik, Keetlinik, Tahikyoak and other names; Vol. 1/2 overview maps.	Some local/Inuit place names appear in the text and figures. However, it is not clear that all maps consistently include local/common names, accepted community names, official toponyms, and dialectal differences across potentially affected communities.	No consolidated place-name register is provided to show how local names were selected, verified, and applied across maps.	Provide a placename register and map QA/QC table identifying each place name used in the IS, official toponym, local/common Inuit name(s), language/dialect, source/verification method, and all figures/maps where the name appears. Update maps where local names are missing or inconsistently applied.
NIRB	39.	West Kitikmeot Resources Corp.	Executive summary / effects synthesis	Vol. 1 Executive Summary, pp. ES-1 onward; Vol. 1 MD summaries; Vol. 10 cumulative/transboundary/accidents summaries.	The Executive Summary provides a broad summary of the Project, benefits, phases, VCs, and conclusions. However, it does not consistently provide enough detail on community-specific concerns, unresolved issues, uncertainty, positive-effect distribution, and management-plan dependencies for readers to understand the basis for the final conclusions without consulting many supporting volumes.	The Executive Summary lacks a concise issue-response-conclusion chain showing how key public/Inuit concerns influenced design, mitigation, monitoring, and significance. It also needs clearer treatment of residual cumulative effects and key uncertainties.	Revise or supplement the Executive Summary to include: 1) a table of key issues raised by communities, Inuit organizations, Indigenous groups, and adjacent jurisdictions; 2) the Proponent response; 3) whether the issue changed design, mitigation, monitoring, or conclusions; 4) residual effect and significance; 5) remaining uncertainty; and 6) follow-up commitments.
NIRB	40.	West Kitikmeot Resources Corp.	Executive summary / maps	Vol. 1 Executive Summary and Non-Technical Summary maps; Vol. 1 Figure NTS.1 Regional Context; Vol. 2 Figures 1.3 and 1.4.	Summary maps are provided and are useful for regional orientation. However, technical reviewers and community readers require maps that clearly show all routes and Project components together with potentially affected communities, harvesting/travel areas, sensitive features, marine navigation routes, and road/winter-road connections at readable scales.	Maps in the summary material do not appear to fully integrate all key Project routes, sensitive receptors, and community-use areas needed to understand potential effects.	Provide an updated summary-map package in all required languages showing: Project components; road, winter-road, air and marine routes; potentially affected Nunavut and transboundary communities; key landmarks and local place names; sensitive environmental/cultural features; and major land/marine use areas at scales suitable for public review.

IR Source	IR #	IR Directed To	Subject	IS Reference Reviewed	Reviewer Comments / Reasoning	Missing Information / Gap	Information Requests / IR
NIRB	41.	West Kitikmeot Resources Corp.	Popular summary / plain language	Vol. 1 Non-Technical Summary, pp. NTS-1 onward; Vol. 1 translated sections and machine-translation disclaimer.	A Non-Technical Summary is included and describes the Project, baseline, predicted changes, mitigation, and public participation. However, the language remains relatively high-level, and the required plain-language glossary is not clearly provided. The presence of interim machine translations also limits adequacy for public review until final human-verified translations are supplied.	Plain-language glossary, final verified translations, and a stand-alone confirmation/version of the Popular Summary are needed.	Provide a final stand-alone Popular/Non-Technical Summary in English, French, Inuinnaqtun, and Inuktitut that includes a plain-language glossary, clear explanations of major technical terms, maps/figures at appropriate scales, and a version-control note confirming replacement of any machine-translated text.
NIRB	42.	West Kitikmeot Resources Corp.	Proponent information / ownership	Vol. 2 s. 1.1 Proponent Information, pp. 1-1-1-3; Vol. 1 MD.1.1, pp. MD-3-MD-4.	The IS identifies WKR, ownership context, contact information, mission, some corporate background, and general internal policies. It does not provide a complete description of corporate/management structures, policy applicability across contractors and suppliers, or reporting systems for lessons learned and accountability.	Corporate governance and policy implementation detail is insufficient for verifying accountability for mitigation, monitoring, contractor compliance, and adaptive management.	Provide a Proponent governance and policy addendum that includes: corporate and Project management structure; roles and responsibilities for environmental, socio-economic, health, safety, and cultural commitments; policy list and applicability to employees, contractors, subcontractors, and suppliers; contractor enforcement mechanisms; reporting systems; and procedures for incorporating lessons learned into Project operations.
NIRB	43.	West Kitikmeot Resources Corp.	Proponent experience / capability	Vol. 2 s. 1.1.1 Operational Experience, pp. 1-2-1-3.	The IS provides general statements on WKR's exploration experience, barge landing, aircraft/marine support for baseline studies, spill reporting, safety, engagement, and Arctic/Sub-Arctic operations. These statements are largely qualitative and self-attested. The Project is a large-scale port, road, aerodrome, quarry, and marine-logistics undertaking, which is much broader than prior exploration activities described.	The IS does not provide detailed evidence showing WKR's experience managing infrastructure of comparable scale, complexity, and risk, nor does it clearly identify safeguards to address any experience gaps.	Provide an operational experience and safeguards table covering: 1) WKR's direct experience with ports, marine traffic, aerodromes, all-weather roads, winter roads, quarries, camps, fuel storage, waste systems, and emergency response; 2) compliance history and supporting records; 3) spills, incidents, corrective actions, and lessons learned; 4) contractor/partner experience filling any gaps; and 5) safeguards to ensure competent implementation during construction and operations.

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NIRB	44.	West Kitikmeot Resources Corp.	Financial security / bonding	Vol. 2 s. 1.1.2 Project Funding, pp. 1-3–1-4; Vol. 1 MD.1.4 Land Tenure, p. MD-5; Vol. 11 closure/care and maintenance plan references.	The IS states the Project is primarily permanent infrastructure and that WKR does not expect to post a bond or financial security for reclamation, except potentially for temporary construction areas. This does not fully address premature closure, temporary closure, reduced operations, accidents, long-term stewardship, or compensation for major biophysical or socio-economic damage.	Financial assurance and closure/stewardship cost information are not sufficient to assess long-term risk, abandoned infrastructure scenarios, or accident compensation capacity.	Provide a financial assurance and closure-liability addendum that includes: preliminary reclamation, care and maintenance, decommissioning, post-closure, long-term maintenance, and accident-response cost estimates; assumptions and contingencies; responsible parties; funding mechanism; security/bonding approach; ownership/transfer scenarios; and timing for final security determination.
NIRB	45.	West Kitikmeot Resources Corp.	Project overview / component scope	Vol. 2 s. 1.5 Project Overview, pp. 1-13–1-18; Vol. 2 s. 2 Detailed Project Description; Vol. 1 Executive Summary Project Phases, p. ES-2.	The IS lists key Project components and activities, including port infrastructure, controlled access road, aerodrome, fuel storage, quarries, water crossings, camps, winter roads, and reclamation of temporary areas. However, some features remain conceptual or undetermined, including equalization structures, final design of future-ready components, and the treatment of excluded future third-party uses.	A single phase-by-phase component/activity matrix is needed to verify the scope, timing, and assessment basis for all works and undertakings.	Provide a Project overview matrix listing each component/activity by phase, with location, design status, construction method, operating assumptions, workforce, traffic/shipping/flight assumptions, water/fuel/waste requirements, dependencies, and whether it is included in the Project, future-ready, or excluded/future third-party development.
NIRB	46.	West Kitikmeot Resources Corp.	Quantity and type of explosives to be manufactured and stored	Vol 1, Section MD.1.3; Guideline s. 8.2.11 (Human Health and Safety)	Arising from NRCan-IR 08. NRCan appended "for information - no response needed," which makes this a non-IR. The substance is nonetheless a specific, answerable request that NRCan states it requires to confirm the explosives facility siting is safe under the Explosives Regulations, 2013. Guideline s. 8.2.11 requires worker health/safety assessment for explosives manufacturing and blasting.	Types and quantities of explosives to be manufactured and stored on site are not specified, so the safety of the explosives facility location cannot be assessed.	Specify the quantity and type of explosives to be manufactured, stored and used on site, itemised by type (e.g. quantity of ANFO, quantity of emulsion), by Project phase and by storage location, sufficient to permit assessment of the explosives facility siting against the Explosives Regulations, 2013 and Guideline s. 8.2.11.

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NIRB	47.	West Kitikmeot Resources Corp.	Project location / regional setting	Vol. 2 s. 1.2 Regional Context, pp. 1-4–1-6; Vol. 2 s. 1.5.1 Project Location, p. 1-18; Vol. 3 Knowledge Perspectives; Vol. 9 Human Environment.	The IS provides regional context and identifies nearby communities and broad ecological/cultural context. The more detailed interrelationships between the biophysical environment and residents are distributed across Volumes 3, 6–9, and 10 rather than being synthesized in the introductory location section.	A concise socio-ecological context synthesis is needed to connect location, land/marine use, wildlife, water, culture, health, and community well-being at the outset of the IS.	Provide a Project location and socio-ecological context synthesis that identifies the main pathways connecting land, water, marine areas, wildlife, travel routes, harvesting, country food, community health, cultural practices, and affected communities. Include cross-references to the detailed baseline and effects sections.
NIRB	48.	West Kitikmeot Resources Corp.	Coordinates / mapping	Vol. 1 Table MD.1.2 Project Component Locations, p. MD-6; Vol. 2 Table 1.4 Project Component Locations, p. 1-18.	The IS provides UTM coordinates, latitude, and longitude for the northern and southern road termini, Jericho Station, port marine infrastructure, port landside infrastructure, aerodrome, and winter road PDA.	No major gap identified for the broad coordinate requirement. More precise coordinates may still be needed during detailed design and permitting for individual crossings, quarries, camps, and facilities.	For the next design update, provide an expanded coordinate table for all major permanent and temporary components, including bridges, culverts, quarries, camps, borrow areas, water intakes, outfalls, waste facilities, fuel storage, laydown areas, and monitoring stations.
NIRB	49.	West Kitikmeot Resources Corp.	Land and aquatic uses / sensitive areas	Vol. 2 s. 1.2 Regional Context, pp. 1-4–1-6; Vol. 2 s. 1.4 Land Tenure and Regulatory Authorizations, pp. 1-8–1-10; Vol. 3 Knowledge Perspectives; Vol. 9 TLMRU and Heritage sections.	The IS provides this information across multiple volumes, including regional context, land tenure, TLMRU, heritage, and VC baseline sections. For technical review, the information needs to be more easily integrated spatially so reviewers can compare Project components with land and aquatic use, sensitive areas, cultural/heritage constraints, and waterbodies.	The introductory sections do not provide a consolidated constraints map package showing all listed features together in relation to the Project footprint and alternatives.	Provide a Project location constraints atlas showing Project components relative to: land tenure; current land and aquatic uses; all major waterbodies and navigable waterways; wetlands; species-at-risk habitat; culturally important areas; archaeological/paleontological constraints; harvesting regions; travel routes; camps; communities; parks/protected areas; and other sensitive receptors. Include confidentiality protections where required.
NIRB	50.	West Kitikmeot Resources Corp.	Geospatial files / mapping data	Vol. 1/2 overview and location maps; PDF map notes identify coordinate system and scale on several figures.	The PDFs contain maps, but the PDFs themselves do not confirm that a complete geospatial data package has been provided. Technical review of spatial effects cannot rely solely on static PDF figures, especially for watercourse crossings, caribou ranges, harvest areas, marine routes, cultural sites, and sensitive habitat.	Electronic geospatial data files, metadata, and community scale-reference information are not evident from the PDF record.	Submit GIS files and metadata for all Project features and assessment layers. Provide files in a common projection/datum, with scale limitations, data source, date, and use restrictions. Include community-readable maps with familiar reference points and distances to key communities, camps, travel corridors, and harvesting areas.

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NIRB	51.	West Kitikmeot Resources Corp.	Land tenure / legal boundaries	Vol. 2 s. 1.4 Land Tenure and Regulatory Authorizations, pp. 1-8–1-10; Vol. 2 Figure 1.2 Land Tenures; Vol. 1 MD.1.4, p. MD-5.	The IS states the Project involves both Inuit Owned Land and Crown land and identifies that approximately 116 km of the road is on IOL. It also states that all approvals, permits, and agreements will be completed later and that no tenure type, size, ownership of property, or activities related to development has been included. This does not meet the guideline requirement for legal boundary and tenure detail.	Legal tenure boundaries, parcel-level details, file numbers, terms, fees, and rights-holder information are incomplete or deferred.	Provide a land tenure table and map package identifying every land parcel, lease, permit, easement, right-of-way, quarry concession, access agreement, and water/shoreline tenure required for the Project. Include legal boundary, coordinates, area, file/application number, right holder, land administrator, term, fees if applicable, status, amendments/renewals, and Project activities authorized or proposed.
NIRB	52.	West Kitikmeot Resources Corp.	Permits and authorizations / tenure	Vol. 2 s. 1.4, pp. 1-8–1-12; Vol. 2 Table 1.2 and Table 1.3 regulatory requirements.	The IS lists required authorizations and general land tenure context. It does not provide a complete inventory of existing third-party tenures, permits, licences, or authorizations that may be intersected or affected by the Project, nor does it provide a consultation record with those holders.	Existing rights and tenure conflicts may affect access, construction, mitigation, and cumulative effects. The record is not sufficient to identify affected tenure holders or unresolved conflicts.	Provide an existing-tenure interaction table listing all existing tenures, licences, permits, authorizations, claims, leases, research permits, tourism operations, water licences, and land-use authorizations that overlap or may be affected by the Project. Include holder, authorization number, location, activity, potential interaction, consultation date/method, issue raised, resolution status, and required mitigation.
NIRB	53.	West Kitikmeot Resources Corp.	Regulatory regime / standards	Vol. 2 s. 1.4 Regulatory Regime, pp. 1-7–1-12; Vol. 2 Table 1.2 Project Regulatory Requirements; Vol. 2 Table 1.3 Permits, Licences, and Authorizations.	The IS identifies many applicable regulatory approvals and acknowledges possible devolution-related changes. However, it does not provide a full compliance matrix showing how each requirement will be met by phase, nor does it clearly integrate Inuit societal laws/norms, regional plans/studies, standards, and required approvals into a single auditable framework.	A permit list alone is not enough to demonstrate compliance planning or requirements management across design, construction, operation, care and maintenance, closure, and post-closure.	Provide a regulatory compliance matrix that includes applicable statutes, regulations, policies, guidelines, Inuit societal laws/norms, standards, land/resource plans, strategic/regional studies, permits, licences, approvals, responsible authority, phase, requirement, compliance method, evidence/source section, current status, expected application date, issue/expiry date where applicable, and responsible WKR lead.

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NIRB	54.	West Kitikmeot Resources Corp.	Permits / schedule	Vol. 2 Tables 1.2 and 1.3, pp. 1-11–1-12; Vol. 2 text stating Section 2.5 discusses tax obligations.	Required permits and authorizations are listed. However, the table does not provide a complete list of currently held permits/licences with issue/expiry dates, and some authorizations are identified only as 'to be determined' or future. Tax obligations are cross-referenced, but the introductory regulatory table does not summarize the compliance approach.	Reviewers need to know what is currently held, what is pending, what will be required later, and which authorizations could affect construction readiness or the assessment assumptions.	Provide a permit/licence register identifying: authorization name; status; currently held or required; application date; expected decision date; issue date; expiry date; responsible authority; Project phase; activities authorized; dependencies; and whether the authorization could require design, mitigation, monitoring, or schedule changes. Provide a brief summary of steps to meet GN fuel, payroll, and other applicable tax obligations.
NIRB	55.	West Kitikmeot Resources Corp.	Regional context / cross-VC baseline	Vol. 2 s. 1.2 Regional Context, pp. 1-4–1-6; Vol. 9 Human Environment; Vol. 10 Cumulative and Transboundary Assessments.	The IS provides general regional context and cross-references detailed biophysical, human environment, and cumulative effects volumes. The introductory context is useful but high-level. It does not fully synthesize current and future land/aquatic use, future mineral development, community well-being, health, cultural connection, and ecological processes into a single regional baseline narrative that supports cumulative and transboundary review.	The regional context is distributed across the submission and lacks an integrated synthesis of future development, land/aquatic use, socio-ecological relationships, and well-being conditions.	Provide a regional context synthesis addendum that integrates: ecological classifications/processes; key wildlife, freshwater, marine, and climate relationships; existing and future mineral developments; current and future land and aquatic use; harvesting/travel/camps/cultural connection; community health and well-being; regional infrastructure/service capacity; and how this context informs cumulative and transboundary effects assessment.
NIRB	56.	West Kitikmeot Resources Corp.	Design certainty / assessment assumptions	Vol. 2, s. 2.1 Project Design Considerations, pp. 2-1–2-7; Vol. 2, s. 2.6 Detailed Scope of the Project, pp. 2-25 onward; Vol. 4, s. 9.2.4 assessment boundaries; Vol. 1 Appendix B commitments.	The IS describes the Project at a concept/design level and identifies that final siting will be informed by environmental assessment, Inuit, Indigenous and Community Knowledge, geotechnical, oceanographic, hydrology, meteorological, environmental and regulatory conditions, and further engagement. This means important design inputs remain open during technical review.	No consolidated design-basis register identifies which impact predictions rely on preliminary design assumptions, which assumptions remain unverified, and how final design changes could change predicted effects.	Provide a design-basis and assumptions register for each project component, including: 1) current design status; 2) key design assumptions used in the effects assessment; 3) remaining investigations required; 4) effect predictions that depend on each assumption; 5) criteria for determining whether a design change is material to the IS; and 6) a process for notifying NIRB and parties before construction if final design changes affect predicted impacts or mitigation.

IR Source	IR #	IR Directed To	Subject	IS Reference Reviewed	Reviewer Comments / Reasoning	Missing Information / Gap	Information Requests / IR
NIRB	57.	West Kitikmeot Resources Corp.	Climate change / design resilience	Vol. 2, s. 2.1.2 Climate Change and Sustainability, pp. 2-5–2-6; Vol. 5 climate and climate risk assessment; Vol. 10, effects of the natural environment on the Project; Vol. 11 management plans.	The IS recognizes climate change and permafrost preservation as critical design considerations and includes a climate risk assessment. However, the linkage between high-risk climate hazards, final engineering criteria, monitoring thresholds, and adaptive responses is not fully transparent in the Project description.	Climate resilience measures are not presented as a component-by-component design table with final criteria for permafrost thaw, extreme precipitation, wind, icing, sea conditions, tundra fire, water supply, and road/culvert performance.	Provide a climate-adaptation implementation table for each component, including: 1) relevant climate hazard; 2) design criterion or climate allowance; 3) source of climate data; 4) residual risk; 5) monitoring indicator; 6) threshold/action level; 7) maintenance or retrofit response; and 8) review frequency over the 75-year design life.
NIRB	58.	West Kitikmeot Resources Corp.	Ecosystem integrity / habitat loss / cumulative effects	Vol. 2, s. 2.1.1 Biophysical and Socio-Economic Environments and Ecosystem Integrity, pp. 2-1–2-5; Vols. 6–8 effects assessments; Vol. 10 cumulative effects assessment; Vol. 11 management plans.	The IS identifies design measures such as footprint/routing adjustments, buffers, avoidance of ice-rich areas where practical, stream crossing design, fish passage, borrow-source selection, and road-management measures. These are relevant, but the Project description does not show a complete habitat-avoidance and design trade-off record.	The record does not quantify how design changes reduced habitat loss or cumulative disturbance, nor does it provide a clear component-level line of sight from habitat constraints to final siting, footprint, mitigation, and residual effects.	Provide a habitat-avoidance and ecosystem-integrity design record showing: 1) mapped constraints considered; 2) design options reviewed; 3) footprint or routing changes made; 4) habitat loss avoided; 5) residual habitat loss by habitat type and VC; 6) cumulative disturbance assumptions; and 7) management-plan commitments that implement the selected design.
NIRB	59.	West Kitikmeot Resources Corp.	Holistic assessment / systems integration	Vol. 4, s. 9 Effects Assessment Methodology; Vol. 10, s. 31 Holistic Assessment; Vol. 10 volume summary.	The IS includes VC-level assessments and a separate holistic assessment intended to address interactions among terrestrial, marine, social, cultural and health systems. However, the socio-ecological systems framework remains partly separated from the VC conclusions.	The IS does not consistently demonstrate how system interactions changed residual effects, mitigation, monitoring, or significance conclusions for individual VCs.	Provide a socio-ecological systems crosswalk that identifies: 1) each system considered; 2) linked VCs; 3) pathways among land, water, wildlife, people, culture, health and economy; 4) where interactions were carried into residual-effects characterization; 5) where interactions changed mitigation or monitoring; and 6) reasons where documented interactions were not carried forward.
NIRB	60.	West Kitikmeot Resources Corp.	Human environment / design response	Vol. 2, s. 2.1.1, pp. 2-4–2-5; Vol. 9, s. 24–29 human environment assessments; Vol. 11 Socio-economic Monitoring Program and Inuit Human Resources and Business Development Plan.	The Project description identifies positive socio-economic objectives and broad design considerations, but it does not provide a direct design-response record for specific human and community concerns. Many measures are deferred to management plans, access protocols, workforce policies, and monitoring programs.	There is no consolidated table showing how specific community health, well-being, food security, access, infrastructure, vulnerable-group, and mental health concerns altered project layout, workforce design, schedules, access rules, or mitigation.	Provide a community-effects design-response matrix that lists each human/community concern raised; the affected community or group; the project component/activity; the design, operational, mitigation or monitoring response; remaining residual effect; responsible party; and follow-up indicator. Include concerns related to access, harvesting, food security, infrastructure capacity, worker interactions, communicable disease risk, mental health, vulnerable populations, and perceived contamination.

IR Source	IR #	IR Directed To	Subject	IS Reference Reviewed	Reviewer Comments / Reasoning	Missing Information / Gap	Information Requests / IR
NIRB	61.	West Kitikmeot Resources Corp.	Accidents / public safety / emergency response	Vol. 2, s. 2.1.4 Workers Health and Safety, pp. 2-6–2-7; Vol. 10, s. 34 Accidents and Malfunctions; Vol. 11 Risk Management and Emergency Response Plan; Vol. 11 Spill Contingency Plan.	The IS identifies road design speed, line of sight, traffic control, an Occupational Health and Safety Plan, and a Risk Management and Emergency Response Plan. However, the accident and emergency-response plans remain draft/preliminary in important areas.	The Project description does not provide a complete safety-design register linking accident scenarios to final design controls, response capacity, remote-response assumptions, training, emergency equipment, public notification and residual risk.	Provide a safety and accident-design register that includes: 1) worker and public hazard scenarios; 2) design controls incorporated; 3) prevention measures; 4) emergency-response capacity and response times; 5) seasonal constraints; 6) public/community notification procedures; 7) residual risk; and 8) how plan placeholders will be resolved before construction.
NIRB	62.	West Kitikmeot Resources Corp.	Wildlife / footprint / sensory disturbance	Vol. 2, s. 2.1.1, pp. 2-2–2-4; Vol. 6 caribou, birds and other terrestrial wildlife assessments; Vol. 7 freshwater fish and habitat; Vol. 8 marine fish and marine mammals; Vol. 11 WMMP, AEMP and Port/Road Management Plans.	The IS identifies several wildlife-related design measures, including road embankment slopes to facilitate caribou movement, reduced speed zones, stream crossings designed for fish passage, and restricted road use during sensitive periods. However, the design rationale is not complete for all key species and habitat types.	The submission does not provide a consolidated species-by-species design rationale showing how the final location, footprint, timing, noise controls, road-access controls, marine construction methods, vessel operations and monitoring were selected to avoid or minimize effects.	Provide a wildlife design-rationale table for caribou, birds, other terrestrial wildlife, freshwater fish, marine fish and marine mammals. The table should identify design constraints, alternatives considered, final design response, residual disturbance area, sensory-disturbance controls, timing restrictions, monitoring methods, thresholds and adaptive management actions.
NIRB	63.	West Kitikmeot Resources Corp.	Heritage resources / harvesting areas / design constraints	Vol. 2, s. 2.1.1, p. 2-4; Vol. 3 knowledge and engagement sections; Vol. 9, s. 30 Heritage Resources; Vol. 11 Heritage Resources Management Plan.	The IS states that documented archaeological sites were an evaluation criterion during port selection and that knowledge and engagement informed design. However, the heritage assessment identifies data gaps, and the Project description does not provide a complete constraints-based siting record for archaeological resources, harvesting areas, or quarrying/soapstone areas.	The record does not clearly show all known heritage, harvesting, fishing, wildlife-use and quarrying constraints considered, the buffers used, or design changes made to avoid or reduce effects.	Provide a constraints map package and design-change log showing: 1) known archaeological and heritage resources; 2) known harvesting, fishing, travel and quarrying/soapstone areas where confidentiality allows; 3) buffers and avoidance criteria; 4) project design changes made in response; 5) remaining data gaps; 6) planned pre-construction surveys; and 7) procedures if new sites are identified.
NIRB	64.	West Kitikmeot Resources Corp.	Engagement / Inuit Knowledge / traceability	Vol. 2, s. 2.1.5 Public Engagement and Inuit Qaujimajatuqangit, pp. 2-7–2-8; Vol. 3, s. 4–6; Vol. 1 Appendix B commitments.	The IS states that the road alignment reflects extensive engagement input to the extent practical and that knowledge systems were incorporated. However, the record does not provide a complete traceable decision log showing which inputs changed project design or why some inputs were not adopted.	No complete engagement/knowledge-to-design matrix links issues raised by communities, Inuit organizations, Indigenous groups and knowledge holders to specific planning or design decisions.	Provide an engagement and knowledge design-decision register that identifies: 1) issue or knowledge input; 2) source/community/organization; 3) affected project component; 4) design or planning response; 5) whether the input changed routing, siting, schedule, mitigation, monitoring or access controls; 6) rationale where input was not adopted; and 7) follow-up commitments.

IR Source	IR #	IR Directed To	Subject	IS Reference Reviewed	Reviewer Comments / Reasoning	Missing Information / Gap	Information Requests / IR
NIRB	65.	West Kitikmeot Resources Corp.	Future development / project scope	Vol. 2, s. 2.3 Future Development, pp. 2-10–2-11; Vol. 2, s. 2.6.1 detailed components; Vol. 10 cumulative effects assessment.	The IS describes future-ready infrastructure and anticipated third-party uses, including potential mineral concentrate storage, cargo areas, laydown, explosives, fuel storage, equipment maintenance and future users. It also states construction and operation of those facilities are outside the current Project scope.	The distinction between Project scope, future-ready enabling works, reasonably foreseeable third-party use, and excluded future development is not sufficiently clear for assessing induced and cumulative effects or project-splitting concerns.	Provide a future-development scope table and map package identifying: 1) all future-ready areas and expandable components; 2) whether each is included in the current Project; 3) design capacity or envelope; 4) third-party dependencies; 5) likely traffic, fuel, cargo, workforce and marine-use assumptions; 6) associated biophysical and socio-economic effects; and 7) rationale for inclusion or exclusion from current assessment scope.
NIRB	66.	West Kitikmeot Resources Corp.	Precautionary principle / uncertainty	Vol. 2, s. 2.1.3 Precautionary Principle, pp. 2-6–2-7; Vol. 4 Effects Assessment Methodology; Vol. 11 EMS and management plans.	The IS restates the precautionary principle and explains that mitigation, monitoring and EMS implementation will support continual improvement. However, the document does not provide a decision record showing where uncertainty or risk of irreversible harm caused WKR to adopt a more conservative design or mitigation option.	The application of precaution is described generally rather than demonstrated through specific decisions, uncertainty thresholds, conservative assumptions, or rejected alternatives.	Provide a precautionary-principle application register identifying: 1) areas of scientific or design uncertainty; 2) potential for serious or irreversible harm; 3) conservative assumptions used; 4) design or mitigation decisions made because of uncertainty; 5) alternatives rejected because of risk; and 6) monitoring/adaptive management triggers for each uncertainty.
NIRB	67.	West Kitikmeot Resources Corp.	Sustainability / benefits and burdens	Vol. 2, s. 2.1.2 Climate Change and Sustainability, pp. 2-5–2-6; Vol. 2, s. 1.6 and s. 2.5; Vol. 9 economic, employment, health and community assessments; Vol. 10 conclusions.	The IS describes expected sovereignty, security, mineral access, community, supply-chain, employment and economic benefits. However, sustainability is not presented as a balanced test against adverse effects, intergenerational equity, ecological integrity, food security, Inuit harvesting and the distribution of benefits and burdens.	No consolidated sustainability analysis demonstrates how Project benefits and adverse effects are balanced across communities, generations, ecosystemic integrity, future land use, and country food/cultural continuity.	Provide a sustainability assessment addendum that evaluates: 1) ecosystem integrity; 2) intergenerational equity; 3) durable social and economic benefits; 4) Inuit harvesting, culture and food security; 5) distribution of benefits and burdens by community and population group; 6) future generations; and 7) how monitoring will verify that predicted sustainability benefits occur.

IR Source	IR #	IR Directed To	Subject	IS Reference Reviewed	Reviewer Comments / Reasoning	Missing Information / Gap	Information Requests / IR
NIRB	68.	West Kitikmeot Resources Corp.	Closure / post-closure / financial security	Vol. 2, s. 2.1 Project Design Considerations, p. 2-1; Vol. 2, s. 2.6.4 Decommissioning and Reclamation Phase, p. 2-54; Vol. 11 Progressive Reclamation Plan; Vol. 1 Appendix A closure concordance.	The IS states that road and port components are permanent infrastructure and that the Project does not include plans for decommissioning and reclamation of main components. Temporary areas would be reclaimed in accordance with permit conditions.	The IS does not demonstrate how permanent infrastructure would be closed, decommissioned, transferred, or maintained if operations cease. It also does not provide closure contaminant levels, post-closure dose/risk estimates, aesthetics, long-term maintenance responsibility, or funding/security approach for permanent components.	Provide a conceptual closure and long-term stewardship framework for permanent and temporary infrastructure, including: 1) closure scenarios; 2) decommissioning or transfer options; 3) contaminant/material inventories; 4) post-closure public and ecological exposure pathways; 5) aesthetics and land-use objectives; 6) monitoring and maintenance requirements; 7) financial responsibility/security; and 8) community and Inuit organization involvement.
NIRB	69.	West Kitikmeot Resources Corp.	Purpose and need / engagement traceability	Vol. 2, s. 1.6 Project Purpose and Need, pp. 1-20–1-25; Vol. 3, s. 6 Public Engagement; Vol. 2, s. 2.1.5.	The IS describes proponent objectives related to sovereignty, security, mineral access, community benefits and social benefits. It also describes engagement history. However, the incorporation of public perspectives into the stated purpose and need is not fully traceable.	The IS does not provide a clear public-perspective purpose-and-need matrix showing which public comments shaped the Project objectives, scope, alternatives, or design.	Provide a purpose-and-need engagement matrix identifying: 1) public, Inuit organization, Indigenous group and community comments related to project purpose/need; 2) how those comments were considered; 3) whether they changed project objectives, alternatives, scope or design; and 4) rationale where public preferences were not incorporated.
NIRB	70.	West Kitikmeot Resources Corp.	Economic feasibility / net benefit	Vol. 2, s. 1.6; Vol. 2, s. 2.5.1 Economic Benefits, pp. 2-20–2-22; Vol. 9, s. 27 Employment and Economy.	The IS identifies transportation, sovereignty, security, community resupply, mineral access and economic opportunities, and provides GDP/employment estimates. However, the economic feasibility information is not presented as a complete net-benefit assessment for technical review.	Capital cost estimates are provided, but operating costs, closure costs, revenues, financing assumptions, benefit durability and adverse social/cultural/economic trade-offs are not fully integrated into the feasibility/benefit rationale.	Provide an economic feasibility and net-benefit addendum that includes: 1) capital, operating, maintenance, closure/stewardship and financing assumptions; 2) expected revenues or funding sources; 3) direct, indirect and induced benefits; 4) adverse socio-economic and cultural costs; 5) uncertainty/sensitivity analysis; and 6) distribution of benefits and losses by community and region.
NIRB	71.	West Kitikmeot Resources Corp.	Infrastructure networks / induced development	Vol. 2, s. 1.6.1–1.6.3; Vol. 2, s. 2.3 Future Development; Vol. 10 cumulative and transboundary effects assessments.	The IS describes the Project as multi-use infrastructure that may improve regional supply chains, security and mineral access. It also notes future development and induced mining potential. However, longer-term network implications are not assessed through clear scenarios.	The IS does not provide a scenario-based assessment of future transportation networks, third-party road/port use, southern road connections, airstrip expansion, CCG use, mineral traffic and community use over the Project life.	Provide a long-term infrastructure network scenario analysis identifying: 1) likely future users and uses; 2) infrastructure capacity and expansion triggers; 3) traffic and shipping assumptions; 4) implications for communities, harvesting, safety and maintenance; 5) cumulative effects by scenario; and 6) governance and access-management arrangements.

IR Source	IR #	IR Directed To	Subject	IS Reference Reviewed	Reviewer Comments / Reasoning	Missing Information / Gap	Information Requests / IR
NIRB	72.	West Kitikmeot Resources Corp.	Land use / access governance / user inventory	Vol. 2, s. 1.6 and s. 2.3; Vol. 3 knowledge and engagement sections; Vol. 9, s. 24 Traditional Land, Marine and Resource Use; Vol. 11 Road and Port Management Plans.	The IS identifies some current and future user groups, including community users, CCG, mineral exploration and mining users. However, the user inventory is not complete enough to support access-management, cumulative effects, safety and rights-related review.	There is no consolidated inventory of past, current and future users by area, season, purpose, governance requirements, access permissions, and potential conflicts with Project operations.	Provide a past/current/future user inventory for the LSA, RSA and project infrastructure, including: 1) user group; 2) area and season of use; 3) purpose of use; 4) rights or authorization basis; 5) expected future use; 6) potential conflict with Project operations; 7) access governance; and 8) monitoring/communication commitments.
NIRB	73.	West Kitikmeot Resources Corp.	Net benefit / distributional effects	Vol. 2, s. 2.5 Economic and Employment Information; Vol. 9, s. 24–29 human environment assessments; Vol. 10 holistic and cumulative assessments.	The IS emphasizes economic and strategic benefits and assesses adverse human environment effects in separate VC chapters. It does not provide a consolidated net-benefit analysis that balances benefits against adverse social, cultural, harvesting, food security, health, well-being and alternative-economic effects.	Potential losses or reductions in traditional economy activities, tourism/recreation, harvesting efficiency, cultural practices, country food confidence, and alternative land-use values are not integrated into a net-benefit framework.	Provide a net-benefit analysis that includes: 1) economic benefits; 2) adverse social, cultural, health, well-being and economic effects; 3) potential reduction or displacement of existing or alternative economic activities; 4) traditional economy impacts; 5) distribution of benefits and losses by community and population group; 6) uncertainty; and 7) measures to optimize benefits and mitigate losses.
NIRB	74.	West Kitikmeot Resources Corp.	Alternatives / Inuit Organization engagement	Vol. 2, s. 2.4 Alternatives, pp. 2-11–2-19; Vol. 3, s. 6 Public Engagement; Vol. 2, s. 2.1.5.	The alternatives section states criteria were informed by Inuit, Indigenous and Community Knowledge, but the IS does not provide a complete record showing early Inuit Organization involvement in alternative means, criteria development, weighting, or assessment structure.	The alternatives assessment lacks a traceable record of who participated in criteria selection, how criteria were weighted, whether Inuit Organizations proposed or rejected alternatives, and how Inuit values changed the preferred alternative.	Provide an alternatives-engagement record identifying: 1) Inuit Organizations engaged; 2) timing of engagement; 3) alternatives discussed; 4) criteria proposed by Inuit Organizations or knowledge holders; 5) weighting or assessment structure input; 6) resulting changes to alternatives or scoring; and 7) unresolved concerns.
NIRB	75.	West Kitikmeot Resources Corp.	Socio-economic distribution / well-being	Vol. 2, s. 2.5; Vol. 9, s. 26 Community Health and Well-being; Vol. 9, s. 27 Employment and Economy; Vol. 11 SEMP.	The IS includes socio-economic and health assessments, but the distribution and magnitude of benefits and losses are not presented in a single life-of-project analysis by socio-economic group, vulnerable group, gender, age, community, or mental-health pathway.	The record does not clearly quantify or characterize who benefits, who may experience adverse effects, how long effects last, and what monitoring will detect uneven benefit distribution or social stress.	Provide a distributional socio-economic effects analysis over construction, operations, care and maintenance, closure/stewardship and future development scenarios. Include community, gender, age, Inuit/non-Inuit, vulnerable groups, employment status, household income, mental health/well-being pathways, benefit/loss magnitude, uncertainty, indicators, thresholds and adaptive measures.

IR Source	IR #	IR Directed To	Subject	IS Reference Reviewed	Reviewer Comments / Reasoning	Missing Information / Gap	Information Requests / IR
NIRB	76.	West Kitikmeot Resources Corp.	Alternatives / no-go / criteria	Vol. 2, s. 2.4 Alternatives, pp. 2-11–2-19; Table 2.2 Alternatives; Vol. 1 Appendix A alternatives concordance.	The IS presents three project location options and selected component alternatives. The information is useful but does not fully show all alternatives considered, all alternatives screened out, how the no-go alternative was analyzed, or how criteria and ratings were applied.	The alternatives record lacks a full criteria/weighting/scoring table, no-go comparison, sensitivity analysis, and traceability from Inuit/Indigenous/community input to final alternative selection.	Submit a complete alternatives assessment record that includes: 1) all alternatives considered and screened out; 2) no-go alternative; 3) criteria and weighting; 4) scoring rationale and evidence; 5) Inuit, Indigenous and Community Knowledge inputs; 6) uncertainty and sensitivity tests; 7) reasons for selecting or rejecting each alternative; and 8) identification of any alternatives deferred to later design or excluded from assessment.
NIRB	77.	West Kitikmeot Resources Corp.	Alternatives / comparability / transboundary effects	Vol. 2, s. 2.4 Alternatives, Table 2.2, pp. 2-13–2-19; Vol. 10 transboundary effects assessment.	The alternatives table rates development/construction, operations and local/regional effects. However, the ratings are broad and do not consistently evaluate health, well-being, cultural, food-security, cumulative, climate, or transboundary consequences for each alternative.	The alternatives assessment is not detailed enough for reviewers to verify that the preferred plan is most reasonable across all required impact categories, especially cultural, health, well-being, transboundary and cumulative effects.	Provide an expanded alternatives comparison table with quantitative and qualitative ratings for each alternative across: 1) cost; 2) technical feasibility; 3) climate resilience; 4) freshwater, terrestrial and marine effects; 5) wildlife and harvesting effects; 6) cultural and heritage effects; 7) health and well-being; 8) food security; 9) economic benefits/losses; 10) cumulative effects; and 11) transboundary effects.
NIRB	78.	West Kitikmeot Resources Corp.	Alternatives assessment for the road corridor — ecological, cultural and IQ/IK criteria; need for an all-season road	Vol 2, Section 2.4 (Alternatives); Guideline s. 6.2.1	Arising from KHTO-IR-011 and ADNLC-IR-05, which ask the same question at different depth. ADNLC provides the stronger drafting: it asks for per-route mapping against caribou critical habitat and challenges the stated basis for rejecting the calving-ground-avoiding route (that it was longer). A longer route is not necessarily the higher-impact route.	No transparent comparison of corridor alternatives against ecological and cultural criteria; no evidence of how IQ/IK/CK informed route selection; no analysis of a port-only option or of a seasonal versus all-season road.	Provide: (a) detailed evidence of whether and how IQ/IK/CK were used in the analysis of alternative routes, and whether the resulting conclusions were corroborated with Knowledge Holders; (b) for each alternative route, maps and supporting reports showing how the route interacts with caribou calving and post-calving grounds, water crossings, migration and movement corridors, eskers, seasonal and rutting habitat — overlaid with collar and movement data across all available years, and with Inuit and Indigenous Knowledge of critical areas; (c) the rationale for rejecting the route that avoids the calving grounds, addressing whether route length was weighted against habitat sensitivity; (d) alternatives analysis for a port-only option (no road) and for future mines using winter roads or other transport, with tables showing how regional benefits change without the road; and (e) water-crossing design options, access-control and land-use management measures, seasonal versus all-season access, future-use and cumulative scenarios, and closure and reclamation alternatives. Present the criteria, weightings and basis for the preferred alternative.
NIRB	79.	West Kitikmeot Resources Corp.	BAT / energy alternatives / GHG	Vol. 2, s. 2.4 Alternatives; Vol. 2, s. 2.6.1 port landside infrastructure; Vol. 5 GHG assessment; Vol. 11 management plans.	The Project description mentions renewable power generation among port landside infrastructure and discusses fuel/diesel systems, but the alternatives assessment does not provide a robust best-available-technology or alternative-energy comparison.	There is no clear assessment of renewable, hybrid, low-carbon, electrification, energy-efficiency, or fuel alternatives for power generation, road/port operations, construction equipment, heating, and long-term operations.	Provide a best-available-technology and energy alternatives assessment that includes: 1) options considered; 2) feasibility in Arctic conditions; 3) GHG reductions; 4) air quality effects; 5) reliability and safety; 6) costs; 7) implementation schedule; 8) reasons for rejection; and 9) how selected technologies will be updated over the Project life.

IR Source	IR #	IR Directed To	Subject	IS Reference Reviewed	Reviewer Comments / Reasoning	Missing Information / Gap	Information Requests / IR
NIRB	80.	West Kitikmeot Resources Corp.	Alternatives / uncertainty / climate / cumulative effects	Vol. 2, s. 2.4 Alternatives; Vol. 4 methodology; Vol. 5 climate risk assessment; Vol. 10 cumulative effects assessment.	The IS identifies broad criteria and rating outcomes for alternatives. It does not fully show how Arctic vulnerability, climate-change risk, cumulative effects, uncertainty, baseline limitations and precautionary decision-making were applied to each alternative.	Alternatives screening does not include a transparent uncertainty/sensitivity analysis or explanation of how alternatives would perform under climate-change and cumulative-development scenarios.	Provide an alternatives sensitivity analysis showing how rankings change under: 1) higher climate-risk assumptions; 2) increased cumulative development; 3) different habitat and harvesting weighting; 4) lower confidence in baseline data; 5) stronger precautionary weighting; and 6) different community preference assumptions.
NIRB	81.	West Kitikmeot Resources Corp.	Project scope / project splitting	Vol. 2, s. 1.5 Project Overview, pp. 1-13–1-19; Vol. 2, s. 2.2 Project Phases; Vol. 2, s. 2.3 Future Development; Vol. 2, s. 2.6 Detailed Scope of the Project.	The IS describes a large set of Project components and exclusions. It also identifies future-ready areas and expandable infrastructure, while excluding future third-party mineral concentrate handling, spur roads, and other facilities from the current scope.	The boundary between included works, future-ready enabling works, excluded future works and reasonably foreseeable induced activities is not clear enough for technical review of cumulative effects, project splitting and mitigation responsibility.	Provide a project-scope boundary table that lists each component, activity, work and alternative means as: included in Project, future-ready/enabling, reasonably foreseeable induced, excluded third-party, or previously assessed. For each item, provide location, phase, design status, expected user, regulatory status, related effects assessment location, and rationale for scope treatment.
NIRB	82.	West Kitikmeot Resources Corp.	Project description / design detail	Vol. 2, s. 2.6 Detailed Scope of the Project, pp. 2-25–2-54; Table 2.7 Summary of Main Project Components; Vol. 1 Fact Sheet.	The IS provides a systematic description of main components, including port, aerodrome, road, Jericho Station, winter roads, camps, quarries, bridges, culverts and utilities. However, some design details remain approximate or undetermined.	Important project-description details remain to be finalized, including final quarry locations, drainage equalization structures, detailed camp locations/timing, final marine outfall/diffuser details, final water and wastewater infrastructure, and final site layouts in future-ready areas.	Provide project component data sheets for each major and temporary component, including: location coordinates; design status; footprint; capacity; timing; activity description; equipment; workforce; material/fuel/water/waste quantities; design uncertainties; environmental interactions; and references to mitigation/monitoring plans.
NIRB	83.	West Kitikmeot Resources Corp.	Schedule / disturbance windows / thresholds	Vol. 2, s. 2.2 Project Phases, pp. 2-8–2-10; Vol. 2, s. 2.6.2 Construction Phase; Vol. 2, s. 2.6.3 Operations and Maintenance Phase; Vol. 11 management plans.	The IS provides a conceptual schedule, construction sequence and operations description. However, a consolidated activity schedule with seasonality and disturbance intensity across all components is not provided in a form that supports technical review.	The submission does not provide a single schedule identifying high-disturbance periods for blasting, quarrying, marine construction, dredging, pile driving, vessel movements, aircraft operations, road construction, water crossings, wildlife-sensitive periods, and public/harvester notification windows.	Provide an integrated project activity schedule by phase, component, month/season, frequency, duration, expected disturbance level, applicable code/threshold/permit limit, affected VC, mitigation, monitoring and communication requirement. Highlight activities with increased disturbance and identify timing constraints to protect wildlife, fish, marine mammals, heritage resources and harvesters.

IR Source	IR #	IR Directed To	Subject	IS Reference Reviewed	Reviewer Comments / Reasoning	Missing Information / Gap	Information Requests / IR
NIRB	84.	West Kitikmeot Resources Corp.	Project phases / care and maintenance / closure	Vol. 2, s. 2.2 Project Phases, pp. 2-8–2-10; Vol. 2, s. 2.6.4 Decommissioning and Reclamation Phase, p. 2-54; Vol. 11 management plans.	The IS presents construction and operations/maintenance phases and states that operations will continue indefinitely for permanent infrastructure. It does not present a complete phase matrix for reduced operations, modifications, temporary closure/care and maintenance, final closure, reclamation and post-closure for all permanent components.	The absence of a complete reduced-operation, care-and-maintenance, closure and post-closure description limits review of long-term environmental, socio-economic, safety, access, monitoring and financial responsibilities.	Provide a project-phase matrix for each component identifying: 1) pre-construction/site preparation; 2) construction; 3) operations; 4) reduced operations; 5) maintenance; 6) modifications/expansions; 7) temporary closure/care and maintenance; 8) final closure/decommissioning/reclamation; 9) post-closure; 10) timeframes; 11) works/undertakings; 12) monitoring and mitigation plans; and 13) responsible parties.
NIRB	85.	West Kitikmeot Resources Corp.	Future development / project splitting / induced effects	Vol. 2, s. 2.3 Future Development, pp. 2-10–2-11; Vol. 10 cumulative effects assessment, RFI scenarios; Vol. 2 port layout and expandable infrastructure descriptions.	The IS acknowledges foreseeable future development and future-ready infrastructure. It also states that third-party development will be the responsibility of those users and outside the current scope. This is a central uncertainty because the Project is intended to enable future mineral exploration and mining.	The IS does not provide sufficient conceptual design, activity envelopes, traffic/shipping/workforce assumptions, ownership/responsibility, or effects assessment for all foreseeable expansions and third-party uses to fully address project-splitting concerns.	Provide a Future Development Addendum that identifies each foreseeable expansion or third-party use, including: infrastructure required; conceptual footprint and capacity; timing; likely users; traffic/shipping/fuel/workforce assumptions; associated biophysical, socio-economic, health, well-being, cultural and rights-related effects; mitigation responsibility; regulatory pathway; and rationale for inclusion or exclusion from the current Project.
NIRB	86.	West Kitikmeot Resources Corp.	Future development / cumulative assumptions	Vol. 2, s. 2.3 Future Development; Vol. 2, s. 2.6.1 detailed components; Vol. 10, s. 32 cumulative effects assessment.	The IS identifies expandable fuel storage, expandable airstrip length, future third-party port areas and induced mining projects. However, the design capacity, thresholds and cumulative effects implications of these future development assumptions are not clearly integrated in one place.	Reviewers cannot readily verify whether the current design has been sized for future scenarios and whether the cumulative assessment uses matching assumptions for traffic, utilities, fuel, waste, wastewater, workforce, marine movements and emergency response.	Provide a future-scenario design/cumulative-effects crosswalk that shows: 1) each future scenario; 2) design capacity assumed; 3) utility and ancillary infrastructure implications; 4) cumulative-effects assumptions; 5) monitoring indicators; 6) expansion thresholds; and 7) conditions under which additional NIRB review would be required.

IR Source	IR #	IR Directed To	Subject	IS Reference Reviewed	Reviewer Comments / Reasoning	Missing Information / Gap	Information Requests / IR
NIRB	87.	West Kitikmeot Resources Corp.	Economic information / closure costs / financial assurance	Vol. 2, s. 1.1.2 Project Funding, p. 1-3; Vol. 2, s. 2.5 Economic and Employment Information, pp. 2-20–2-25; Vol. 2, s. 2.6.4; Vol. 1 Appendix A economic/closure concordance.	The IS provides a construction cost estimate and economic-output estimates. It states that WKR does not expect to post reclamation security for permanent infrastructure and that temporary-area security would be addressed later. Operating costs, closure/stewardship costs, expected revenues and financial assurance details are not fully provided.	The economic context is incomplete without operating costs, closure/care-and-maintenance/post-closure costs, revenue or funding assumptions, contingencies, long-term maintenance responsibilities and security/bonding approach.	Provide a financial information table including: 1) capital costs; 2) annual operating and maintenance costs; 3) reduced-operation/care-and-maintenance costs; 4) closure, reclamation, decommissioning and post-closure stewardship costs; 5) expected revenues or funding sources; 6) contingencies and uncertainty ranges; 7) ownership/liability assumptions; and 8) financial security or bonding approach.
NIRB	88.	West Kitikmeot Resources Corp.	Employment / training / labour demand	Vol. 2, s. 2.5.1–2.5.2, pp. 2-20–2-23; Vol. 9, s. 27 Employment and Economy; Vol. 11 Inuit Human Resources and Business Development Plan.	The IS provides FTE estimates for construction and operations and broad construction/operations workforce categories. However, job types, classification system, skill/education requirements, training requirements and person-years by phase are not fully detailed.	The employment information does not provide a detailed occupation-by-occupation labour demand table that reviewers can use to assess local/inuit employment feasibility, training needs, labour supply constraints and benefit distribution.	Provide a workforce demand table by phase and year, including: occupation/classification code; number of positions; full-time/part-time/seasonal status; person-years; required skills; education/certification; training required; likely source community/region; Inuit/Nunavummiut hiring target; contractor/direct employer status; and assumptions for direct, indirect and induced employment.
NIRB	89.	West Kitikmeot Resources Corp.	Human resources / equity / cultural safety	Vol. 2, s. 2.5.6 Training and Employment, pp. 2-25; Vol. 11 Inuit Human Resources and Business Development Plan; Vol. 9 community health and employment assessments.	The IS commits to developing training and employment strategies and inclusive policies, but many detailed workplace benefit, cultural safety, harassment/discrimination, Inuit advancement, Inuit women retention, contractor assistance and country food program commitments are not yet provided.	The information is not yet sufficient to assess whether predicted employment and community benefits will be realized or whether adverse worker/community interaction and equity effects will be mitigated.	Provide a detailed Inuit employment, training, retention and workplace-support plan including: 1) benefits and EAP availability for employees and contractors; 2) Inuit advancement and management pathways; 3) training and apprenticeship schedules; 4) Inuit women recruitment/retention measures; 5) harassment/discrimination policies and training; 6) cultural awareness and onsite support; 7) family/community support; 8) country food program details; 9) contractor-assistance measures; and 10) reporting indicators and corrective actions.
NIRB	90.	West Kitikmeot Resources Corp.	Impact Assessment Methodology – Factors to be Considered	Vol. 4, s. 9.1, pp. 9-1–9-2; Vol. 1, Main Document summary and Appendix A concordance; Vol. 2, s. 1–2; Vol. 10, ss. 31–36.	The IS addresses the s. 103 factors across multiple volumes and Volume 4 states that the assessment method was developed to address the factors in the Guidelines. However, the information is dispersed and several factors depend on later design or later management-plan completion.	No consolidated NuPPAA s. 103 compliance crosswalk shows where each factor is addressed, which conclusions depend on future design or future plans, and what remaining uncertainty affects NIRB's ability to rely on the conclusions.	Provide a NuPPAA s. 103 factor crosswalk that identifies, for each factor: 1. IS volume/section/page references; 2. the principal conclusion; 3. supporting data/analysis; 4. remaining uncertainty; 5. mitigation or monitoring relied upon; and 6. any information deferred to permitting, detailed design, or management-plan finalization.

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NIRB	91.	West Kitikmeot Resources Corp.	Impact Assessment Methodology – Factors to be Considered	Vol. 9, ss. 24–30; Vol. 10, ss. 31 and 33; Vol. 11, Socio-economic Monitoring Program and Inuit Human Resources and Business Development Plan.	The IS identifies potential socio-economic benefits and adverse effects, including employment, infrastructure, food security, well-being, TLMRU, and transboundary considerations. Some positive residual effects are not carried forward for detailed characterization, and socio-economic monitoring commitments remain high level.	The distribution, durability, certainty, and monitoring of positive effects are not consistently assessed. Vulnerable groups, communities outside Nunavut, and long-term well-being outcomes are not supported by a complete indicator set with thresholds and adaptive responses.	Provide a well-being and benefits assessment addendum that: 1. characterizes positive and adverse socio-economic effects using consistent criteria; 2. identifies affected communities and groups; 3. defines indicators, thresholds, and data sources; 4. explains how benefits will be optimized; and 5. links each predicted benefit to enforceable commitments and monitoring.
NIRB	92.	West Kitikmeot Resources Corp.	Impact Assessment Methodology – Factors to be Considered	Vol. 3, ss. 5–6; Vol. 4, ss. 9.2.3 and 9.4.1; Vol. 10, s. 31; Vol. 11, management-plan framework.	The IS describes engagement and the role of Inuit, Indigenous, and Community Knowledge, and states that these inputs informed design, mitigation, monitoring, and holistic assessment. The record is not always traceable from individual priority or concern to a specific assessment decision or commitment.	No complete issue-to-decision matrix shows which community priorities changed project design, mitigation, monitoring, significance, or follow-up, and which priorities were not adopted with rationale.	Provide a community values and decision-traceability matrix identifying: 1. the value, priority, or desired outcome; 2. source/community or group; 3. affected VC or project component; 4. how it informed assessment or design; 5. whether it changed mitigation/monitoring/significance; 6. rationale where not adopted; and 7. planned follow-up.
NIRB	93.	West Kitikmeot Resources Corp.	Impact Assessment Methodology – Factors to be Considered	Vol. 10, s. 35, Effects of the Environment on the Project; Vol. 5, s. 12 and Climate Risk Assessment; Vol. 6, s. 14; Vol. 2, design considerations.	The IS includes a dedicated effects-of-environment assessment and climate risk assessment. It identifies climate and geohazard interactions with road, port, water, and other infrastructure. However, some final design responses and monitoring thresholds are deferred.	The IS does not provide a component-by-component resilience implementation table linking each hazard to design criteria, monitoring, inspection frequency, maintenance triggers, contingency actions, and residual risk.	Provide a hazard-resilience matrix for all major components, including roads, crossings, port structures, fuel systems, aerodrome, water/wastewater systems, quarries, camps, and winter road. For each hazard, identify design criteria, scenario assumptions, residual risk, monitoring, action thresholds, responsible party, and reporting.
NIRB	94.	West Kitikmeot Resources Corp.	Impact Assessment Methodology – Factors to be Considered	Vol. 5–9 VC assessments; Vol. 10, ss. 31, 34, 35; Vol. 11 management plans.	The IS provides separate VC assessments and an additional holistic assessment. However, the VC assessments generally conclude significance at the individual VC level, while Volume 10 acknowledges that interconnections are considered mainly in the holistic discussion.	The IS does not consistently show how cross-VC interactions changed residual effects conclusions, significance determinations, or management responses.	Provide a cross-VC interaction and systems-effects matrix showing direct, indirect, induced, cumulative, and cascading pathways among biophysical, cultural, health, well-being, and socio-economic VCs. Identify where interaction analysis changes predicted effects, mitigation, monitoring, or significance.

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NIRB	95.	West Kitikmeot Resources Corp.	Impact Assessment Methodology – Factors to be Considered	Vol. 4, s. 9.4.3, pp. 9-14–9-17; Vol. 10, s. 32; Appendix 9A and Appendix 9A-2; VC cumulative sections in Vols. 5–9.	The IS includes VC-specific cumulative effects and a consolidated CEA overview. The methodology initiates CEA only where adverse residual Project effects overlap spatially and temporally with other projects or activities.	This screening method may exclude cumulative interactions involving positive effects, Indigenous/public concerns, future induced development, climate change, or system-level effects not captured by an adverse residual-effect screen.	Provide a cumulative-effects screening justification table for every VC and holistic system. Include residual effects screened in and out, positive/beneficial effects, climate interactions, induced development pathways, community-raised concerns, rationale for exclusions, and sensitivity cases where screening assumptions materially affect conclusions.
NIRB	96.	West Kitikmeot Resources Corp.	Impact Assessment Methodology – Factors to be Considered	Vol. 4, s. 9.4.1.2, pp. 9-11–9-12; Vol. 11, s. 37 and management plans; Vol. 1 Appendix B commitments; Vol. 2, project phases and permanent infrastructure discussion.	The IS identifies mitigation, enhancement, management plans, and monitoring. However, restoration after permanent closure is limited because the Project is treated as permanent infrastructure with no closure/reclamation plan for permanent components.	The assessment lacks a complete mitigation-to-residual-effect register and does not provide a closure/post-closure restoration framework for permanent infrastructure if use ceases, infrastructure is transferred, or maintenance fails.	Provide a commitments and mitigation register linking each measure to: 1. VC/effect; 2. phase; 3. implementing party; 4. timing; 5. performance indicator; 6. threshold; 7. monitoring and reporting; and 8. contingency if ineffective. Also provide a conceptual closure/post-closure stewardship framework for permanent components.
NIRB	97.	West Kitikmeot Resources Corp.	Scope of the Impact Assessment	Vol. 4, s. 9.2, pp. 9-3–9-7; Vol. 2, Project components and phases; Vol. 5–9 VC assessments.	The IS identifies ecosystemic and socio-economic VCs and assessment boundaries. The scope covers construction and operations/maintenance, but reduced operation, temporary care and maintenance, final closure, and post-closure are not assessed as separate stages.	Temporal scope does not fully align with all NIRB project stages, and temporary care and maintenance is assumed similar to lower-level operations without a phase-specific assessment.	Provide a phase-scope addendum explaining how each VC is assessed for site preparation/pre-construction, construction, operations, reduced operation, maintenance, modifications, temporary closure/care and maintenance, final closure/decommissioning/reclamation, and post-closure, or provide a reasoned, VC-specific rationale for exclusions.
NIRB	98.	West Kitikmeot Resources Corp.	Valued Ecosystemic and Socio-Economic Components	Vol. 4, s. 9.2.1, pp. 9-3–9-4; Vol. 4, s. 9.2.3, pp. 9-4–9-5; Vol. 3, ss. 5–6; Vol. 5–9 VC rationale sections.	The IS lists ecosystemic and socio-economic VCs and provides selection criteria. It states that selection reflects engagement, Inuit Knowledge, effects pathways, receptors, and professional judgment.	The IS does not include a consolidated VC selection and validation table showing all candidate VCs considered, those excluded, engagement input on VC selection, and rationale for each exclusion.	Provide a VC selection/validation table identifying: 1. candidate VCs considered; 2. selected/excluded status; 3. selection criteria applied; 4. engagement and knowledge input; 5. rationale for exclusion; 6. potential pathway if excluded; and 7. where selected VCs are assessed.

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NIRB	99.	West Kitikmeot Resources Corp.	Valued Ecosystemic and Socio-Economic Components	Vol. 5–9 VC baseline and study-area mapping; Vol. 3, IK/engagement and regional historical overview; Vol. 10, s. 31.	The VC volumes include maps for study areas and many baseline resources. The IS also describes Inuit and community values. However, the connection between mapped VC locations and the groups/communities that value them is not consistently summarized across all VCs.	No consolidated map/key-values index identifies each important VC location, why it is important, who identified it, confidentiality constraints, and how it influenced boundaries, effects, and mitigation.	Provide a VC values and mapping index that, respecting confidentiality, links key mapped VC locations and areas of concern to knowledge sources, community or group values, sensitivity, project interactions, and mitigation/monitoring decisions.
NIRB	100.	West Kitikmeot Resources Corp.	Valued Ecosystemic and Socio-Economic Components	Vol. 4, ss. 9.4.1.1, 9.4.1.3 and 9.4.1.4, pp. 9-9–9-13; Vol. 5–9 VC-specific effects characterization tables; Vol. 11 monitoring plans.	The methodology states that each VC identifies measurable parameters and characterization criteria. Some indicators are quantitative, while others are qualitative or based on professional judgment. Several management plans contain preliminary thresholds or placeholders.	Indicators and thresholds are not consolidated, and for some VCs there is limited linkage between public/IK indicators, regulatory thresholds, action levels, and adaptive management.	Provide a consolidated indicators and thresholds register by VC and effect pathway, identifying: 1. measurable parameter; 2. data source; 3. threshold/action level; 4. rationale and knowledge source; 5. monitoring method; 6. adaptive action; and 7. whether the indicator was suggested by communities, agencies, or technical experts.
NIRB	101.	West Kitikmeot Resources Corp.	Valued Ecosystemic and Socio-Economic Components	Vol. 4, Table 9.1, pp. 9-9–9-11; Vol. 2, s. 2; Vol. 10, s. 32; Appendix 9A-2 RFI Physical Activities.	The IS provides a standard project activity/effects matrix and uses it in VC assessments. The matrix includes construction and operations/maintenance activities.	The matrix does not fully represent reduced operations, temporary care and maintenance, final closure/post-closure, or induced third-party use as phase-specific interactions.	Provide an expanded interaction matrix including all NIRB-required phases and reasonably foreseeable induced activities, with columns showing whether each activity is assessed as Project, cumulative, transboundary, or excluded, and the rationale for exclusions.

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NIRB	102.	West Kitikmeot Resources Corp.	Valued-component-centric spatial and temporal boundaries for transboundary effects	Vol 10, Section 33 (Transboundary Effects Assessment) and Appendix A; Vol 1, MD.2 and MD.10.2; Guideline s. 7.4.4	Arising from GTC-12. This identifies a substantive deficiency: boundaries were set project-centrally and do not extend outside Nunavut, which materially limits the transboundary assessment. This is also required under Guideline s. 7.4.4. NIRB-IR-105 already requests a spatial-boundary addendum covering boundary rationale, treatment of future-ready/induced infrastructure, transboundary considerations and boundary sensitivity, and NIRB-IR-106 requests a boundary-engagement table. The residual value of GTC-12 is its specific challenge that boundaries do not extend outside Nunavut although direct Project components occur there.	Spatial and temporal boundaries for VCs likely to experience transboundary effects do not extend beyond Nunavut; direct Project components occurring outside Nunavut are not captured.	Provide: (a) confirmation of which direct Project components occur outside Nunavut and how each was assessed; (b) the rationale for boundaries that do not extend beyond Nunavut for VCs identified as having a likely transboundary effect; and (c) revised VC-centric boundaries for those VCs, or a reasoned justification for retaining project-centric boundaries. Where already answered under NIRB IRs #105 and #106, cross-reference rather than repeat.
NIRB	103.	West Kitikmeot Resources Corp.	Assessment Boundaries – Spatial Boundaries	Vol. 4, s. 9.2.4.1, pp. 9-5–9-7; Vol. 5–9 VC study-area maps; Vol. 2 alternatives section.	The IS defines PDA, LAA, and RAA and states that VC-specific boundaries are mapped and justified. The PDA includes buffers around components.	Spatial boundaries for alternative means and for future-ready/induced components are not presented in a consolidated way, limiting comparison of alternatives and induced-effect areas.	Provide a spatial-boundary addendum showing, by VC: 1. PDA/LAA/RAA definitions; 2. rationale; 3. maps; 4. treatment of alternatives; 5. treatment of future-ready/induced infrastructure; 6. transboundary considerations; and 7. uncertainty or sensitivity in boundary selection.
NIRB	104.	West Kitikmeot Resources Corp.	Assessment Boundaries – Spatial Boundaries	Vol. 4, s. 9.2.4.1, p. 9-7; Vol. 3, s. 6 engagement; Vol. 10, s. 33 transboundary effects.	The IS states that boundaries were selected in consideration of engagement feedback and Inuit Knowledge, and that VC assessments summarize relevant input about boundaries.	The IS does not provide a consolidated boundary-engagement record showing who was asked about each spatial boundary, what alternatives were proposed, and how the Proponent responded.	Provide a boundary-engagement table listing, for each VC boundary: 1. groups consulted; 2. date/method; 3. boundary-related input; 4. alternative boundary proposed; 5. whether adopted; 6. rationale if not adopted; and 7. remaining disagreement or uncertainty.
NIRB	105.	West Kitikmeot Resources Corp.	Assessment Boundaries – Spatial Boundaries	Vol. 4, s. 9.2.4.1, pp. 9-5–9-7; Vol. 5–9 VC boundary rationales; Vol. 10, ss. 32–33.	VC-specific study areas address many of the criteria. However, the basis for some boundaries is dispersed and may rely on standard buffers or zones of influence without a cross-check against all Guideline criteria.	No boundary rationale matrix demonstrates that each criterion in the Guidelines was considered for each VC and system.	Provide a spatial-boundary rationale matrix by VC that explicitly addresses project extent, ecosystem extent, pollutant transport, noise, bioaccumulation, communities, TLMRU, RFI projects, induced development, and transboundary impacts.

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NIRB	106.	West Kitikmeot Resources Corp.	Assessment Boundaries – Spatial Boundaries	Vol. 4, s. 9.4.2, p. 9-14; Vol. 10, s. 33 Transboundary Effects Assessment, pp. 33-1–33-11.	The IS includes a stand-alone transboundary effects section and cross-references VCs. It considers geographic proximity and shared resources.	The stand-alone section is relatively high level and does not consistently provide detailed pathway tables for all VCs, affected rights holders, mitigation, residual effects, and monitoring.	Revise the transboundary section to include a pathway table identifying each affected VC/resource, receptor/community/group, direct/indirect/induced/cumulative pathway, spatial extent, mitigation, residual effect, significance rationale, monitoring, and cross-reference to detailed VC analysis.
NIRB	107.	West Kitikmeot Resources Corp.	Assessment Boundaries – Spatial Boundaries	Vol. 4, s. 9.2.4.1, p. 9-7; Vol. 3, s. 6; Vol. 5–9 boundary sections.	The IS states that alternative spatial boundaries identified by Inuit are addressed with rationale if not adopted, but this information is not consolidated for reviewer verification.	There is no single list of alternative boundaries proposed through engagement and the Proponent’s decision for each alternative.	Provide an alternative-boundary disposition table summarizing every boundary adjustment or alternative boundary raised by Inuit, Indigenous groups, communities, agencies, or technical reviewers, and documenting adoption status and rationale.
NIRB	108.	West Kitikmeot Resources Corp.	Assessment Boundaries – Temporal Boundaries	Vol. 4, s. 9.2.4.2, pp. 9-7–9-8; Vol. 2, project schedule; Vol. 11, care and maintenance/management plans.	The IS defines Construction and Operations and Maintenance. It states that operations continue indefinitely, no closure/reclamation is planned for permanent infrastructure, and temporary care and maintenance is not assessed because it is assumed to resemble lower-level operations.	Required phases are not separately assessed. No final closure, post-closure, or phase-specific care and maintenance temporal boundaries are provided for permanent infrastructure.	Provide revised temporal boundaries for every NIRB-required phase, including reduced operation, care and maintenance, final closure/decommissioning/reclamation, and post-closure. For each phase, identify timeframe, activities, affected VCs, assumptions, monitoring, and rationale if a phase is excluded.
NIRB	109.	West Kitikmeot Resources Corp.	Assessment Boundaries – Temporal Boundaries	Vol. 4, s. 9.2.4.2, p. 9-8; Vol. 2, s. 2.4 alternatives.	The IS discusses alternatives and states that temporal boundaries for alternatives are discussed in Volume 2. However, a comparative temporal analysis of alternatives is not clearly consolidated.	The record does not show construction, operations, maintenance, closure, seasonal constraints, or climate-vulnerability timelines for each alternative compared with the preferred option.	Provide an alternatives temporal-boundary comparison table showing, for each alternative: construction duration, operations duration, maintenance requirements, closure/post-closure implications, seasonal constraints, climate-change vulnerability period, and implications for effects predictions.
NIRB	110.	West Kitikmeot Resources Corp.	Assessment Boundaries – Temporal Boundaries	Vol. 4, s. 9.2.4.2, p. 9-8; Vol. 3, ss. 5–7; Vol. 9, ss. 24–25.	The IS describes historical context, IK and engagement, and temporal boundaries based mainly on construction and operations.	The temporal boundary rationale is not clearly tied to seasonal harvesting, migration, travel, cultural use, intergenerational use, or future community objectives for every relevant VC.	Provide a temporal-boundary rationale table that documents how public input, IQ/IK/CK, technical expertise, seasonal cycles, and past/present/future land and water uses informed each VC’s temporal boundaries.

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NIRB	111.	West Kitikmeot Resources Corp.	Assessment Boundaries – Temporal Boundaries	Vol. 5, s. 12 Climate; Vol. 5 Climate Risk Assessment; Vol. 10, s. 35; Vol. 4, s. 9.2.4.2.	The IS includes climate and climate-risk assessments and recognizes that climate change affects design and VCs.	Climate-change scenario information is not consistently integrated into VC-specific temporal boundaries, closure/post-closure considerations, or adaptive management thresholds.	Provide a climate-temporal integration addendum showing the climate scenarios used, time horizons, affected VCs and components, projected changes, uncertainty ranges, and how those scenarios alter temporal boundaries, mitigation, design, monitoring, and closure/post-closure assumptions.
NIRB	112.	West Kitikmeot Resources Corp.	Description of Ecosystemic and Socio-Economic Environments and Baseline Information	Vol. 4, s. 9.3, p. 9-8; Vol. 3, s. 7 Regional Historical Overview; Vol. 5–9 baseline sections and appendices.	The IS contains extensive baseline information and refers to appended baseline reports. The Regional Historical Overview provides long-term context.	Baseline trend and variability information is uneven across VCs, and not all VC baselines clearly evaluate interrelations, long-term trends, or the adequacy of baseline periods for prediction and monitoring.	Provide a baseline adequacy summary by VC identifying: 1. baseline data sources; 2. time period and seasonality; 3. spatial coverage; 4. long-term trends; 5. variability; 6. data gaps; 7. implications for prediction confidence; and 8. monitoring needed to reduce uncertainty.
NIRB	113.	West Kitikmeot Resources Corp.	Description of Ecosystemic and Socio-Economic Environments and Baseline Information	Vol. 3, ss. 4–7; Vol. 9, ss. 24–26; Vol. 10, s. 31.	The IS includes TLMRU, food security, community health and well-being, and IK/engagement information. The information is largely qualitative and distributed across volumes.	The baseline does not consistently convert community-defined conditions, values, and desired outcomes into measurable monitoring indicators or thresholds.	Provide a human-environment baseline indicator table for TLMRU, food security, cultural practices, well-being, and land/marine use. Include community-defined indicators, baseline values or qualitative condition, data source, confidentiality constraints, monitoring approach, thresholds, and responsible party.
NIRB	114.	West Kitikmeot Resources Corp.	Description of Ecosystemic and Socio-Economic Environments and Baseline Information	Vol. 4, s. 9.3, p. 9-8; Vol. 5–9 methods/baseline sections; Vol. 1 Appendix A; Vol. 11 follow-up/monitoring plans.	Each VC generally describes methods and sources. Volume 4 states that baseline methods are summarized in VC assessments and appended reports.	There is no cross-VC baseline gap register identifying validation status, confidence levels, significant data gaps, and how gaps translate into intensified monitoring or mitigation.	Provide a cross-VC baseline data adequacy and gap register, including: dataset, method, coverage, QA/QC, validation, confidence level, limitations, missing seasons/locations, effect on predictions, and actions/timing to fill gaps.
NIRB	115.	West Kitikmeot Resources Corp.	Description of Ecosystemic and Socio-Economic Environments and Baseline Information	Vol. 3, Regional Historical Overview and IK; Vol. 6 caribou and other wildlife baseline; Vol. 7–8 aquatic/marine baseline; Vol. 5 climate/air/noise baseline.	The IS uses historical studies, previous project records, government datasets, and IK. Some VCs, such as caribou, include long-term cycles and collar data.	The adequacy of baseline duration and spatial/seasonal coverage is not consistently evaluated for every VC, especially where current data are limited, older, or derived from previous projects.	Provide a VC-specific long-term variability assessment that identifies whether baseline data are sufficient to capture seasonal, interannual, cyclic, and climate-related variability. Where insufficient, identify how IQ/IK/CK, additional studies, or monitoring will address the gap.
NIRB	116.	West Kitikmeot Resources Corp.	Description of Ecosystemic and Socio-Economic Environments and Baseline Information	Vol. 4, s. 9.5, p. 9-18; Vol. 11 management and monitoring plans; Vol. 5–9 follow-up sections.	The IS proposes monitoring and adaptive management through Volume 11 plans. Some plans are preliminary and contain placeholders or commitments to refine later.	The link between baseline datasets, monitoring design, thresholds, and adaptive management is incomplete for several VCs.	Provide a monitoring design crosswalk showing how each baseline dataset will be used in follow-up monitoring, including sampling locations, parameters, methods, frequency, reference/control design, action thresholds, reporting, data accessibility, and adaptive management.

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NIRB	117.	West Kitikmeot Resources Corp.	Impact Assessment Approach	Vol. 4, s. 9.4, pp. 9-8-9-18; Vol. 10, ss. 31-33; Vol. 5-9 VC assessments.	The IS describes the assessment approach and includes VC-specific, holistic, cumulative, and transboundary sections.	The assessment does not always demonstrate how community objectives, s. 35 rights concerns, and interrelations changed the residual effects or significance conclusions.	Provide an integrated assessment traceability matrix linking each community objective, s. 35 rights-related concern, and cross-VC interaction to the relevant effect pathway, mitigation, residual effect, significance conclusion, and monitoring commitment.
NIRB	118.	West Kitikmeot Resources Corp.	Impact Assessment Approach	Vol. 3, s. 6 engagement outcomes; Vol. 4, ss. 9.2.3 and 9.4.1; Vol. 5-9 VC assessments.	The IS summarizes engagement and incorporates concerns in VC sections. However, the degree to which each concern is assessed, scoped out, or resolved is not always transparent.	No consolidated issue-by-issue technical assessment register shows whether each concern was carried into effects assessment, scoped out, or addressed through mitigation/monitoring.	Provide a community concern assessment register identifying each concern, source, VC/pathway, assessment location, whether assessed or scoped out, rationale, mitigation/monitoring response, and residual uncertainty.
NIRB	119.	West Kitikmeot Resources Corp.	Impact Assessment Approach – Individual VC Analysis	Vol. 4, Table 9.1, pp. 9-9-9-11; Vol. 5-9 VC interaction tables.	The IS uses a project activity/effects table with construction and operations/maintenance activities and checkmarks.	The interaction table does not explicitly address final closure, post-closure, reduced operation, care and maintenance, or induced development as separate interaction categories.	Provide updated VC interaction tables covering all NIRB phases and induced development. Where closure/post-closure or care and maintenance is omitted, provide a VC-specific rationale and identify any monitoring or contingency measures that would apply.
NIRB	120.	West Kitikmeot Resources Corp.	Impact Assessment Approach – Holistic Discussion	Vol. 4, s. 9.6, p. 9-18; Vol. 10, s. 31, pp. 31-1-31-28.	The IS includes a Holistic Assessment organized around Land and Freshwater, Ocean, and Human Environment holistic VCs. It is intended to synthesize interconnections.	The Holistic Assessment is mainly a synthesis and does not clearly re-run significance determinations based on system-level thresholds or community desired outcomes.	Provide a revised holistic assessment table identifying system-level pathways, community objectives, desired outcomes, system-function indicators, thresholds, mitigation, monitoring, and whether holistic analysis changes any VC-level residual effect or significance conclusion.
NIRB	121.	West Kitikmeot Resources Corp.	Impact Assessment Approach – Holistic Discussion	Vol. 3, ss. 5-6; Vol. 10, s. 31; Vol. 11 management plans.	The IS describes values and desired outcomes in narrative form, and the Holistic Assessment references avoiding unacceptable effects and enhancing benefits.	The IS does not provide a clear design/mitigation/monitoring change log linked to each community objective or desired outcome.	Provide a community objectives implementation table identifying: 1. objective/desired outcome; 2. community/group; 3. related VC/system; 4. future-use consideration; 5. project design response; 6. mitigation/monitoring response; 7. unresolved concern; and 8. reporting/follow-up commitment.
NIRB	122.	West Kitikmeot Resources Corp.	Impact Prediction	Vol. 4, ss. 9.4.1 and 9.4.1.1, pp. 9-8-9-11; Vol. 3, ss. 5-6; Vol. 5-9 VC effects sections.	Volume 4 states that impact prediction draws on engagement, Inuit Knowledge, scientific evidence, Indigenous Knowledge, and Community Knowledge.	The IS does not consistently show, for each effect prediction, which knowledge source informed the prediction and whether the prediction changed because of that knowledge.	Provide an impact-prediction evidence table for each VC/effect pathway showing scientific evidence, engineering data, IQ/IK/CK, engagement input, how each source influenced prediction, and where sources were not used or were weighted differently.

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NIRB	123.	West Kitikmeot Resources Corp.	Impact Prediction	Vol. 3, ss. 5–6; Vol. 9, ss. 24–26; Vol. 10, s. 31.	Well-being and community values are discussed in human-environment and holistic sections.	The method for translating values and desired outcomes into impact predictions is not consistently documented, especially for cross-VC effects such as wildlife access, perceived contamination, and cultural continuity.	Provide a values-to-prediction traceability table identifying community values/desired outcomes, effect pathways, prediction metrics, significance considerations, and monitoring indicators.
NIRB	124.	West Kitikmeot Resources Corp.	Impact Prediction	Vol. 4, s. 9.4.4, p. 9-17; Vol. 5–9 prediction confidence and uncertainty sections.	Each VC includes a confidence/uncertainty discussion and Volume 4 provides a general framework.	Uncertainty treatment is not standardized across VCs, and uncertainty does not always clearly translate into additional mitigation, follow-up intensity, or conservative significance conclusions.	Provide a standardized uncertainty register for each predicted effect, including data limitations, model uncertainty, mitigation uncertainty, future-condition uncertainty, confidence rating, implications for significance, and associated follow-up/adaptive management.
NIRB	125.	West Kitikmeot Resources Corp.	Impact Prediction	Vol. 3, ss. 5–6; Vol. 4, ss. 9.2.3 and 9.4.1; Vol. 5–9 VC assessments.	The IS states that Inuit Knowledge and engagement informed assessments and that rationale is provided where concerns or pathways are not carried forward.	There is no consolidated reconciliation table identifying differences between scientific/engineering findings and Inuit, Indigenous, or Community Knowledge, or how disagreement was addressed.	Provide a knowledge-source reconciliation table identifying: 1. topic/VC; 2. scientific/engineering conclusion; 3. IQ/IK/CK or community conclusion; 4. difference or uncertainty; 5. Proponent’s preferred interpretation; 6. rationale; 7. mitigation/accommodation/monitoring adopted; and 8. unresolved issues.
NIRB	126.	West Kitikmeot Resources Corp.	Impact Prediction	Vol. 4, ss. 9.4.1–9.4.3; Vol. 10, ss. 32–33; Vol. 9 TLMRU/food security/health sections.	The IS includes direct/indirect residual effects, cumulative effects, and transboundary assessment. Induced development is considered in cumulative effects.	Induced impacts and s. 35 rights-related pathways are not consistently assessed in detailed VC sections, and the link between induced development and community/rights impacts is not fully traceable.	Provide an induced and rights-related effects addendum identifying direct, indirect, induced, cumulative and transboundary pathways, affected Indigenous groups/rights/interests, assumptions, mitigation, monitoring, residual effects, and significance rationale.
NIRB	127.	West Kitikmeot Resources Corp.	Impact Prediction	Vol. 4, Table 9.1 and s. 9.4.1; Vol. 10, s. 34; Vol. 11 Risk Management and Emergency Response Plan and Spill Contingency Plan.	Accidents and malfunctions are assessed separately in Volume 10. The VC interaction matrix focuses on normal construction and operations activities.	Accident/malfunction effects are not integrated into every VC interaction table, and emergency response plans include sections to be developed.	Provide a VC-by-VC accident and malfunction interaction matrix linking credible scenarios to affected VCs, unmitigated effects, mitigation/response measures, residual effects, uncertainty, significance, and monitoring/reporting.

IR Source	IR #	IR Directed To	Subject	IS Reference Reviewed	Reviewer Comments / Reasoning	Missing Information / Gap	Information Requests / IR
NIRB	128.	West Kitikmeot Resources Corp.	Impacts of the Natural Environment on the Project	Vol. 10, s. 35; Vol. 5, s. 12; Vol. 6, s. 14; Vol. 2, s. 2.1 design considerations.	The IS identifies a range of natural hazards and climate risks. The Project design considers permafrost, drainage, climate resilience, and Arctic conditions.	The assessment does not provide a detailed, auditable hazard-by-component design response table with final design assumptions, monitoring triggers, and residual risk.	Provide a natural hazard assessment table covering each required hazard, affected component, scenario assumptions, design criteria, likelihood/consequence, monitoring, action threshold, maintenance/adaptive response, and residual risk.
NIRB	129.	West Kitikmeot Resources Corp.	Impacts of the Natural Environment on the Project	Vol. 2, water crossing descriptions; Vol. 7, water resources assessment; Vol. 10, s. 35; Vol. 11 Water Management Plan/Road Management Plan.	The IS describes major and minor crossings and hydrological considerations. Some drainage equalization structures and final crossing designs remain subject to detailed design and field verification.	Final crossing inventory, design hydrology, climate allowances, icing controls, and monitoring thresholds are not fully consolidated.	Provide a water-crossing resilience addendum identifying all bridges, culverts, and equalization structures; design flows; climate factors; fish passage criteria; icing/debris assumptions; inspection frequency; action thresholds; and design-change reporting.
NIRB	130.	West Kitikmeot Resources Corp.	Climate Change – Project Contributions to Climate Change	Vol. 5, s. 12 Climate; Vol. 5 GHG emissions tables; Vol. 2 design and energy options.	The IS quantifies Project GHG emissions and references federal climate guidance. Diesel power is part of the Project assumptions, with possible renewable components described.	The record does not provide a complete net-zero pathway to 2050, detailed BAT/BEP evaluation, emissions intensity for every operations year, carbon sink/source assessment, or firm reporting/mitigation commitments.	Provide a GHG and decarbonization addendum including annual net GHG by phase, equation terms, emissions intensity, carbon sink/source effects, BAT/BEP options assessment, renewable/hybrid feasibility, net-zero pathway for a 75-year design life, reduction targets, and reporting schedule.
NIRB	131.	West Kitikmeot Resources Corp.	Climate change as a cumulative-effects driver, not only a baseline condition	Vol 4 (Effects Assessment Methodology — cumulative effects); Vol 5, Section 12 (Climate Change); Guidelines ss. 7.4.2.1 and 7.4.3	Arising from KHTO-IR-002. The IS treats climate change largely as a baseline condition and applies a single climate projection rather than a range of scenarios.	Climate change is not carried through as a cumulative stressor interacting with Project effects; temporal boundaries are not climate-informed; no vulnerability assessment of VCs or traditional-use areas under a range of future climate scenarios.	Provide: (a) the cumulative-effects assessment re-run with climate change as an interacting stressor (not solely a baseline condition), using models spanning the range of plausible future climate scenarios as required by Guideline s. 7.4.2.1; (b) climate-informed temporal boundaries and the rationale for them; (c) assessment of interactions between Project effects and climate-driven change, specifically sea-ice loss and permafrost thaw; and (d) a vulnerability assessment of ecosystemic VCs and Inuit land use under those scenarios.
NIRB	132.	West Kitikmeot Resources Corp.	Climate Change – Project Impacts on VCs in Climate Context	Vol. 5, s. 12; Vol. 5 Climate Risk Assessment; Vol. 6–8 climate-sensitive VC assessments; Vol. 10, s. 31.	The IS considers climate change and some climate-sensitive VCs, particularly permafrost, hydrology, and infrastructure.	Climate vulnerability and interaction analysis is not consistently presented for every relevant VC, and the influence of climate scenarios on mitigation and monitoring is not uniformly traceable.	Provide a VC climate vulnerability matrix identifying selected climate models/scenarios, rationale, uncertainty, projected VC vulnerabilities, Project-climate interaction pathways, IK/engagement input, mitigation implications, and monitoring/adaptive triggers.

IR Source	IR #	IR Directed To	Subject	IS Reference Reviewed	Reviewer Comments / Reasoning	Missing Information / Gap	Information Requests / IR
NIRB	133.	West Kitikmeot Resources Corp.	Cumulative Effects Assessment	Vol. 4, ss. 9.4.3.1–9.4.3.2, pp. 9-14–9-16; Vol. 10, s. 32; Appendix 9A.	The IS describes CEA scoping, uses a Project Inclusion List, and includes VC-specific CEA subsections.	The CEA scoping rationale is not fully consolidated across VCs, and the method screens in CEA based on adverse residual overlap, which may not capture community priority issues or system-level cumulative effects.	Provide a CEA scoping matrix by VC/system identifying selection/exclusion criteria, boundaries, baseline conditions, engagement/IK input, community priority issues, residual effect screen result, and rationale for each inclusion/exclusion.
NIRB	134.	West Kitikmeot Resources Corp.	Cumulative Effects Assessment	Vol. 4, ss. 9.4.3.2–9.4.3.3, pp. 9-15–9-16; Vol. 10, s. 32; Appendix 9A and 9A-2.	The IS includes a PIL and describes reasonably foreseeable induced activities. It uses a 20-year future temporal limit for cumulative effects while the Project has a 75-year design life.	The assumptions for RFI and induced mines/roads/traffic/shipping/labour/fuel are dispersed and may not adequately test high/low development scenarios or the full design life.	Provide a consolidated RFI and induced-development assumptions appendix with quantitative assumptions, data sources, timing, uncertainty ranges, credible causal links, traffic/shipping/workforce/fuel disturbance estimates, and sensitivity scenarios over both 20-year and longer-term Project life horizons.
NIRB	135.	West Kitikmeot Resources Corp.	Cumulative Effects Assessment	Vol. 4, s. 9.4.3.3, p. 9-16; Vol. 10, s. 32; VC cumulative sections.	The IS describes cumulative effects pathways and overlap with physical activities.	The interaction methodology does not consistently show additive versus interactive effects, climate-change interactions, or cumulative system responses across VCs.	Provide a cumulative interaction methodology addendum explaining how additive, synergistic, antagonistic, climate-related, and system-level interactions were identified, evaluated, and carried into residual cumulative effects and significance.
NIRB	136.	West Kitikmeot Resources Corp.	Cumulative Effects Assessment	Vol. 4, s. 9.4.3.4, p. 9-16; Vol. 10, s. 32; Vol. 11 management plans.	The IS identifies mitigation within WKR's control and refers to management plans and regional efforts.	There is no complete cumulative mitigation disposition table showing regional measures, collaborative measures, recommendations by parties, adoption status, and reasons for non-commitment.	Provide a cumulative mitigation and recommendations table listing all cumulative-effects measures proposed by WKR, governments, Inuit organizations, Indigenous groups, communities, and technical reviewers; indicate adoption status, responsible party, feasibility rationale, and monitoring/follow-up linkage.
NIRB	137.	West Kitikmeot Resources Corp.	Cumulative Effects Assessment	Vol. 4, s. 9.5, p. 9-18; Vol. 10, s. 32; Vol. 11 monitoring and adaptive management plans.	The IS proposes follow-up and adaptive management, and Volume 11 provides management plans.	Cumulative follow-up measures are not clearly linked to regional monitoring programs, cumulative thresholds, or collaborative governance.	Provide a cumulative-effects follow-up plan identifying regional monitoring linkages, community-based monitoring opportunities, cumulative indicators, thresholds, data-sharing arrangements, adaptive responses, responsible parties, and reporting to NIRB and affected parties.

IR Source	IR #	IR Directed To	Subject	IS Reference Reviewed	Reviewer Comments / Reasoning	Missing Information / Gap	Information Requests / IR
NIRB	138.	West Kitikmeot Resources Corp.	Transboundary Impacts	Vol. 4, s. 9.4.2, p. 9-14; Vol. 10, s. 33, pp. 33-1–33-11; Vol. 8, s. 23; Vol. 9, ss. 24–26.	The IS includes a dedicated transboundary assessment and considers shared resources and harvesting rights.	The assessment is not consistently detailed for all pathways, especially induced development, marine shipping, harvesting rights, food security, and well-being effects outside Nunavut.	Provide a transboundary effects matrix by VC/pathway, including affected jurisdiction/group, rights or use context, Project/RFI activity, direct/indirect/induced/cumulative pathway, mitigation, residual effect, significance, monitoring, and engagement status.
NIRB	139.	West Kitikmeot Resources Corp.	Indicators and Criteria	Vol. 4, ss. 9.4.1.3–9.4.1.4, pp. 9-12–9-13; Vol. 5–9 VC-specific criteria; Vol. 11 monitoring plans.	The IS uses VC-specific measurable parameters and significance criteria.	The rationale for indicators suggested by the public/governments and those not adopted is not provided in one place.	Provide an indicators disposition register showing all indicators proposed by WKR, communities, governments, Inuit organizations, Indigenous groups, and technical experts; adopted/not adopted status; rationale; applicable VC/system; and how indicators support Project, cumulative, transboundary, and significance assessment.
NIRB	140.	West Kitikmeot Resources Corp.	Indicators and Criteria	Vol. 5 air quality and climate; Vol. 7 water/fish; Vol. 8 marine water/fish/mammals; Vol. 9 food security and human health; Vol. 11 monitoring plans.	The IS includes contaminant, water, air, fish, marine, and human-environment indicators in various sections.	There is no integrated exposure/bioaccumulation/observational indicator framework linking environmental media to wildlife, country food, human health, food security, and perceived risk.	Provide an integrated exposure and sensory indicators framework identifying contaminant pathways, bioaccumulation concerns, country food receptors, human health pathways, sensory/observational indicators identified by Inuit/community members, monitoring parameters, action levels, and communication triggers.
NIRB	141.	West Kitikmeot Resources Corp.	Significance Determination	Vol. 4, s. 9.4.1.4, pp. 9-13–9-14; Vol. 5–9 significance sections; Vol. 10, ss. 31–33.	The methodology defines significance at the VC level and uses VC-specific thresholds. It states that Inuit Knowledge and scientific evidence inform significance where available.	The IS does not provide a complete NuPPAA s. 90 significance factor crosswalk by residual effect, nor a clear record of how different parties' views changed significance determinations.	Provide a significance determination crosswalk for each residual Project, cumulative, and transboundary effect, showing NuPPAA s. 90 factors, VC thresholds, knowledge sources, community/rights-holder views, uncertainty, rationale, and final significance conclusion.
NIRB	142.	West Kitikmeot Resources Corp.	Significance Determination	Vol. 4, s. 9.4.1.4, p. 9-13; Vol. 3, ss. 5–6; Vol. 10, s. 31.	The IS states that culturally relevant thresholds are highlighted where available.	Culturally relevant thresholds are not consistently identified for all relevant VCs, and differences between knowledge sources are not consolidated.	Provide a culturally relevant thresholds and significance addendum identifying community-defined thresholds, well-being values, knowledge-source differences, how thresholds were applied, and mitigation/monitoring/accommodation measures used to address unresolved differences.
NIRB	143.	West Kitikmeot Resources Corp.	Significance Determination	Vol. 4, s. 9.4.1.4, p. 9-13; Vol. 10, s. 31; Vol. 9 positive residual effect statements.	The methodology states that residual positive effects are not carried forward to significance determination. This conflicts with the Guideline expectation to assess significance descriptors that include beneficial/positive effects and with the need to understand benefits and trade-offs.	Positive effects are not consistently characterized using residual effects criteria or significance/importance criteria, limiting evaluation of benefit optimization, distribution, certainty, and durability.	Provide a positive-effects characterization and significance/importance addendum for all predicted benefits, including magnitude, extent, duration, frequency, reversibility, certainty, affected groups, dependency on mitigation/enhancement, monitoring indicators, and any conditions required for benefits to materialize.

IR Source	IR #	IR Directed To	Subject	IS Reference Reviewed	Reviewer Comments / Reasoning	Missing Information / Gap	Information Requests / IR
NIRB	144.	West Kitikmeot Resources Corp.	Certainty	Vol. 4, s. 9.4.4, p. 9-17; Vol. 5–9 certainty/confidence sections; Vol. 5 climate assessment.	The IS includes prediction confidence discussions. Some uncertainty is qualitative and varies by VC.	Confidence levels are not consistently tied to decision consequences, precautionary mitigation, monitoring intensity, or contingencies.	Provide a certainty and confidence register for each predicted effect and significance conclusion, including uncertainty source, confidence rating, evidence strength, climate/technology limitations, influence on conclusion, and additional mitigation/monitoring required.
NIRB	145.	West Kitikmeot Resources Corp.	Certainty	Vol. 4, ss. 9.4.4 and 9.5, pp. 9-17–9-18; Vol. 11 management and monitoring plans.	The IS states that monitoring and adaptive management will verify predictions and address unanticipated effects. Volume 11 provides draft plans.	The management plans do not consistently provide final thresholds, contingency actions, research/testing commitments, or precautionary offsets tied to high-uncertainty predictions.	Provide an uncertainty response plan identifying high-uncertainty predictions, precautionary measures, design contingencies, monitoring thresholds, adaptive responses, research/validation commitments, possible offsets, decision authorities, timelines, and reporting commitments.

IR Source	IR #	IR Directed To	Subject	IS Reference Reviewed	Reviewer Comments / Reasoning	Missing Information / Gap	Information Requests / IR
NIRB	146.	West Kitikmeot Resources Corp.	Baseline studies to determine anticipated ecosystemic impacts on the Atmospheric Environment	Volume 5, Section 11.2	Baseline information collected from the project area is relevant to the technical analysis of the Impact Statement because an accurate characterization of existing air quality conditions is necessary to asses the magnitude, extent, and significance of potential project-related air emissions and to evaluate the effectiveness of proposed mitigation measures. The Impact Statement indicates that no project specific baseline air quality data were collected and that the assessment relied on data from other projects, including datasets collected from other regions (Mary River Project). This raises uncertainty regarding whether the baseline conditions used in the assessment are representative of current local conditions, including existing sources of emissions, meteorological conditions, and regional variability in air quality. Consequently, the predicted effects, significance determinations, and proposed mitigation measures may not adequately reflect conditions at the proposed project sites/area.	1. No project-specific baseline air quality data were collected. 2. The rationale for relying on data from other projects is unclear. 3. The representatives of external datasets, including Mary River data, has not been demonstrated. 4. Limitations and uncertainties associated with using external data are not adequately assessed. 5. The use of higher background concentrations may overstate existing conditions and mask project-related effects. 6. Baseline and reference monitoring stations have not been selected or established before development. 7. Without per-development monitoring, it may be difficult to distinguish project impacts from natural or regional variation. 8. Existing air quality conditions have not been adequately characterized to support the impact assessment.	a) The Proponent should provide a clear rationale for not collecting project-specific baseline air quality data and explain how the datasets obtained from other projects were determined to be representative of current conditions within the local study are. The Proponent should also describe the limitations and uncertainties associated with the use of these datasets and assess whether updated or site-specific baseline information is required to ensure that the potential impacts of the proposed project have been appropriately characterized. Reliance on data collected from other projects, such as the Mary River Project, may not provide reliable information to determine long-term ambient air quality impacts. b) The use of higher values reported by other projects as conservative estimates of background levels should be re-evaluated as the baseline values could be much lower than what is being presented as the assumed background air quality concentrations. These values may not provide valuable information on the potential impacts of the proposed project on the atmospheric environment. c) Provide information on how air quality would be monitored to determine potential impacts if there are no baseline and /or reference stations monitored prior to the development of the proposed project. The Air Quality Monitoring Program in Volume 11 notes that precise monitoring locations would be determined in collaboration with regulators and Inuit, etc. These stations should be selected prior to the development of the proposed project and the baseline data should collected now to inform the Impact Statement. d) An assessment of baseline air quality levels should be conducted to establish existing air quality conditions for the project.

NIRB	147.	West Kitikmeot Resources Corp.	Baseline studies to determine anticipated ecosystemic impacts on Noise	Volume 5, Section 13.2	The Draft IS indicates that baseline noise monitoring was conducted in September 2017 and August 2024. However, it is unclear why baseline noise data were only collected during late summer and early fall periods and whether these data are representative of noise conditions throughout the year. Noise conditions in the Project area may vary seasonally due to differences in meteorological conditions, wind regimes, snow and ice cover, wildlife activity, transportation patterns, and other natural or anthropogenic sound sources. The Draft IS does not explain why seasonal baseline monitoring was not undertaken or how the Proponent determined that data collected during two relatively similar seasonal periods are sufficient to characterize existing acoustic conditions within the study areas. Without an understanding of seasonal variability, it is difficult to assess whether the baseline characterization accurately reflects the range of existing conditions that may occur within the PDA, LAA, and RAA, and whether the subsequent noise effects assessment and associated predictions are based on representative baseline conditions when Project activities may occur. This uncertainty may affect the evaluation of Project-related changes in the acoustic environment and the effectiveness of proposed mitigation measures, making it more difficult to evaluate	1. Baseline noise monitoring was limited to August and September, with no clear rationale for excluding other seasons. 2. The representativeness of the monitoring data for annual noise conditions within the PDA, LAA, and RAA has not been demonstrated. 3. Seasonal variability in ambient noise conditions has not been adequately assessed. 4. The use of literature, regional data, and meteorological information to support the baseline assessment is unclear. 5. Uncertainties associated with the limited seasonal monitoring periods have not been adequately evaluated or incorporated into the effects assessment. 6. Potential differences in noise levels during other seasons and their influence on Project effects and significance conclusions have not been assessed. 7. It is unclear whether additional baseline noise monitoring will be completed before construction or why the existing dataset is considered sufficient.	The Draft IS indicates that baseline noise monitoring was conducted in September 2017 and August 2024; however, it is unclear whether seasonal variability in baseline noise conditions was evaluated. The Proponent should provide: a) A rationale for why baseline noise monitoring was limited to September 2017 and August 2024 and why monitoring was not conducted during other seasons. b) An explanation of how the Proponent determined that the collected baseline data are representative of annual noise conditions within the PDA, LAA, and RAA. c) A description of any analyses undertaken to assess seasonal variability in ambient noise conditions, including the use of literature, regional datasets, meteorological information, or other supporting information. d) An assessment of the uncertainty associated with characterizing baseline noise conditions using data collected during limited seasonal periods and an explanation of how this uncertainty was incorporated into the noise effects assessment. e) A discussion of whether baseline noise levels during other seasons could differ materially from those measured during the August and September monitoring periods and, if so, whether this could influence the assessment of Project-related noise effects and significance determinations. f) Identify whether additional baseline noise monitoring is planned prior to Project construction and, if not, provide justification for why the existing dataset is considered sufficient to support the effects assessment and associated conclusions.
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IR Source	IR #	IR Directed To	Subject	IS Reference Reviewed	Reviewer Comments / Reasoning	Missing Information / Gap	Information Requests / IR
					incremental changes relative to existing conditions.		
NIRB	148.	West Kitikmeot Resources Corp.	Use of outdated project-specific bird surveys and field studies	Volume 6, Section 17	Many of the project-specific bird surveys appear to have been completed in 2012, with the majority of surveys dating from 2004-2008. Given that ecological conditions and bird populations can change significantly over time, why were updated baseline surveys not conducted prior to the current assessment? Please explain the rationale for relying on data that are more than a decade old and describe how the proponent determined that these historical datasets remain representative of present-day conditions. This information is relevant to the technical analysis of the Impact Statement because an accurate and current characterization of baseline condition sis necessary to assess the magnitude and significance of project effects on bird populations and habitats. Reliance on baseline surveys conducted primarily between 2004 and 2008, and the most recently in 2012 raises uncertainty regarding whether present-day species occurrence, abundance and habitat use have been adequately characterized.	1. The representativeness of historical datasets for current baseline conditions has not been demonstrated. 2. Updated baseline survey information has not been provided. 3. Potential changes in baseline conditions and their effects on predicted impacts, significance conclusions, and mitigation measures have not been assessed.	The Proponent should explain how the historical datasets remain representative of current conditions or provide updated baseline survey information and an assessment of how any changes in baseline conditions could affect the predicted impacts, significance determinations, and proposed mitigation measures.

NIRB	149.	West Kitikmeot Resources Corp.	Use of outdated project-specific muskox surveys and field studies	Volume 6, Section18.2 and 18.4 to 18.7	The most recent project-specific muskox surveys appear to have been conducted between 2004 and 2013. Although a more recent comprehensive survey was completed in 2022, differences in survey methodology limit direct comparison with the earlier surveys and preclude the establishment of a reliable population trend. Given that ecological conditions, habitat use, distribution, and population abundance can change substantially over time, reliance on data collected more than a decade ago raises uncertainty regarding whether current baseline conditions have been adequately characterized. Inuit Knowledge provided in the Impact Statement indicates the continued presence and use of the area by muskox and contains observations regarding their abundance and distribution. However, no recent project-specific scientific surveys appear to have been conducted to validate or complement these observations, with the assessment relying primarily on surveys completed between 2004 and 2013. Given that ecological conditions and population dynamics can change over time, the absence of recent scientific data introduces uncertainty regarding whether current muskox abundance, distribution, and habitat use have been adequately characterized. The proponent should explain how Inuit Knowledge was integrated with the historical scientific datasets, describe any discrepancies or consistencies between these sources of	1. The rationale for relying on survey data collected between 2004 and 2013 is unclear. 2. The adequacy and representativeness of the historical datasets for current conditions have not been demonstrated. 3. Methodological differences associated with the 2022 survey have not been adequately addressed. 4. Uncertainties related to the inability to establish a muskox population trend have not been assessed. 5. Updated scientific baseline information has not been provided to complement Inuit Knowledge. 6. The current status and resilience of the muskox population have not been adequately characterized. 7. The need for additional or updated baseline surveys has not been assessed. 8. It is unclear whether predicted effects, significance conclusions, and mitigation measures reflect present-day conditions.	The proponent should explain the rationale for relying on survey data collected between 2004 and 2013 and describe how the adequacy and representativeness of these historical datasets were evaluated. The proponent should also explain how the methodological differences associated with the 2022 survey were considered in the assessment, identify the uncertainties associated with the inability to establish a population trend, and assess whether additional or updated baseline information is required to ensure that the potential impacts of the proposed project have been appropriately characterized. Without recent scientific data to complement Inuit Knowledge and establish current baseline conditions and population trends, there is uncertainty regarding whether the assessment has adequately characterized the current status and resilience of the muskox population and, consequently, whether the predicted effects, significance determinations, and proposed mitigation measures appropriately reflect present-day conditions.
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IR Source	IR #	IR Directed To	Subject	IS Reference Reviewed	Reviewer Comments / Reasoning	Missing Information / Gap	Information Requests / IR
					information, and explain why additional surveys were not undertaken to confirm present-day conditions and support the assessment of potential project effects. This information is relevant to the technical analysis of the Impact Statement because an accurate and current understanding of baseline conditions is necessary to assess the magnitude and significance of potential project effects on muskox populations and habitat. Reliance on historical survey data introduces uncertainty as to whether present-day population status, distribution, and habitat use have been adequately characterized. Consequently, the predicted effects, significance determinations, and proposed mitigation measures may not fully reflect current conditions.		

IR Source	IR #	IR Directed To	Subject	IS Reference Reviewed	Reviewer Comments / Reasoning	Missing Information / Gap	Information Requests / IR
NIRB	150.	West Kitikmeot Resources Corp.	Use of outdated project-specific other terrestrial wildlife surveys and field studies	Volume 6, Section 18.2, and 18.8 to 18.19	As with the muskox baseline surveys, project-specific information for moose, grizzly bear, and wolverine relied primarily on baseline studies conducted between 2004 and 2013 to characterize ungulates and other large mammals within the Regional Study Area. The timing and scope of these surveys were informed in part by Inuit Knowledge of migratory behaviour, desktop assessments, and satellite-collar data. Additional baseline work was completed for grizzly bear between 2021 and 2023; however, the wolverine baseline information is largely limited to desktop assessments and a DNA-based population study completed at High Lake in 2008. No comprehensive, recent field-based baseline surveys appear to have been undertaken by the Proponent to update these datasets. Given that ecological conditions, habitat use, distribution, and population abundance can change substantially over time, reliance on data collected more than a decade ago introduces uncertainty as to whether current baseline conditions for these species have been adequately characterized. This uncertainty has implications for the robustness of predicted effects, significance determinations, and the adequacy of proposed mitigation and monitoring measures.	1. The rationale for not completing updated, comprehensive baseline surveys is unclear. 2. The representativeness of historical datasets for current conditions within the Regional Study Area has not been demonstrated.	The Proponent should provide a clear justification for why updated, comprehensive baseline surveys were not completed for these species and explain how the representativeness of the historical datasets has been demonstrated in the context of current conditions within the Regional Study Area.

NIRB	151.	West Kitikmeot Resources Corp.	Use of data compiled from previous studies and existing data sets to characterize baseline conditions for surface water quality and sediment quality	Volume 7, Section 19	The assessment of existing conditions for surface water quality, sediment quality, water quantity, and groundwater relies on information compiled from publicly available datasets, literature sources, project-specific studies, and Inuit, Indigenous, and Community Knowledge collected between 1995 and 2023. While these information sources may provide useful historical context, the Draft IS does not clearly demonstrate that recent, comprehensive field-based baseline surveys were undertaken within the Local Assessment Area (LAA), or where appropriate within the Regional Assessment Area (RAA), to verify current environmental conditions and establish an up-to-date baseline against which Project effects can be assessed. The reliance on datasets spanning nearly three decades introduces uncertainty regarding the representativeness of baseline conditions used in the assessment. Environmental conditions, including water quality, sediment quality, hydrology, and groundwater characteristics, may have changed over time due to natural variability, climate-related influences, or other anthropogenic activities. In the absence of recent baseline data, it is difficult to determine whether the existing conditions characterization accurately reflects current conditions within the study areas or whether the effects assessment and associated predictions are based on outdated information.	1. Recent baseline field investigations for surface water, sediment, water quantity, and groundwater are not clearly documented. 2. The rationale for relying on historical datasets instead of recent field surveys is unclear. 3. The relevance, quality, comparability, and representativeness of datasets collected between 1995 and 2023 have not been demonstrated. 4. Potential changes from climate variability, environmental trends, and regional developments have not been adequately considered. 5. Data gaps, limitations, uncertainties, and assumptions have not been clearly identified or incorporated into the effects assessment. 6. Confidence in the baseline characterization for each aquatic valued component has not been assessed. 7. The effects of limited recent data on impact predictions, mitigation, significance conclusions, and monitoring commitments are unclear. 8. It is unclear whether additional baseline investigations will be completed before construction.	The Draft IS relies on historical and compiled datasets to characterize baseline conditions for surface water quality, sediment quality, water quantity, and groundwater. However, it is unclear whether recent, comprehensive field-based baseline surveys were undertaken to confirm that these datasets remain representative of current environmental conditions within the LAA and RAA. The Proponent should provide: a) A detailed description of all baseline field investigations conducted for surface water quality, sediment quality, water quantity, and groundwater between 2020 and 2025, including sampling locations, sampling frequency, parameters measured, methodologies, and spatial coverage within the LAA and RAA. b) If recent field-based baseline surveys were not completed, provide a rationale for why existing historical datasets were considered sufficient to characterize current baseline conditions and support the effects assessment. c) An explanation of how datasets collected between 1995 and 2023 were evaluated for relevance, comparability, quality, and representativeness of current environmental conditions, including consideration of changes resulting from climate variability, long-term environmental trends, and other regional developments. d) A description of any data gaps, limitations, uncertainties, or assumptions associated with the baseline datasets and an explanation of how these uncertainties were considered in the effects assessment and significance determinations. e) An assessment of the degree of confidence in the baseline characterization for each valued component related to the aquatic environment and how the absence of recent baseline data may affect the reliability of impact predictions, mitigation measures, and monitoring commitments. f) Identify whether additional baseline investigations are planned prior to Project construction and, if so, provide the proposed scope, timing, and objectives of those investigations.
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IR Source	IR #	IR Directed To	Subject	IS Reference Reviewed	Reviewer Comments / Reasoning	Missing Information / Gap	Information Requests / IR
					Furthermore, the Draft IS does not clearly describe how historical datasets collected using different methodologies, sampling objectives, spatial coverage, and temporal scales were evaluated for comparability, quality assurance, and suitability for characterizing present-day baseline conditions. Without this information, reviewers are unable to assess the reliability of the baseline characterization or the level of confidence that should be placed in subsequent impact predictions.		

IR Source	IR #	IR Directed To	Subject	IS Reference Reviewed	Reviewer Comments / Reasoning	Missing Information / Gap	Information Requests / IR
NIRB	152.	West Kitikmeot Resources Corp.	Currency of surface water and sediment quality baseline	Vol 7, Section 19.2.1.2 (Surface Water and Sediment Quality); Appendix 19C	Arising from KAA-IR-34. The baseline was compiled from previous studies with no new field sampling, much of it collected in 2012, while the IS itself predicts climate-driven change to hydrology, permafrost, ice regimes and contaminant pathways. Baseline adequacy is a precondition of the effects assessment, not a licensing matter. This IR overlaps with NIRB-IR-153 which asks whether recent, comprehensive field-based baseline surveys were undertaken to confirm the compiled datasets remain representative. This IR covers the SENSITIVITY of the predictions to that assumption.	No demonstration that the compiled 2012-era baseline remains representative of present-day conditions, nor any sensitivity analysis of the effects predictions to that assumption.	Provide: (a) the vintage, source and spatial coverage of every surface water and sediment quality dataset relied upon; and (b) an assessment of how the effects predictions and significance conclusions would change were present-day conditions to differ from the compiled (largely 2012-era) baseline, having regard to the climate-driven changes the IS itself predicts. Where the currency question is answered under NIRB-IR-153, cross-reference rather than repeat.
NIRB	153.	West Kitikmeot Resources Corp.	Gaps and Uncertainties: Collection of pre-construction data and refinement of project design	Volume 7, Section 19.6.3	The draft IS notes that surface water quantity and groundwater quality assessments are supported by regional datasets and mine-site data, which may not fully represent PDA conditions. Potential gaps in the availability of site-specific information are expected to be addressed with pre-construction data collection and refinement of project design. No information was provided on when these data would be collected and how the project design would be updated based on the additional information collected.	1. The timing for collecting additional data has not been provided. 2. It is unclear how the new information will be incorporated into the IS. 3. The updated data, predictions, and impact assessment may not be available for review before the IS is finalized.	Provide additional information on when the additional data would be collected and how the draft IS would be updated with the new information. The data should be provided prior to the IS being finalized to ensure parties can review the updated predictions and potential impacts from the proposed project.

NIRB	154.	West Kitikmeot Resources Corp.	Baseline studies not completed for hydrologic studies at the port intake lakes and outlet streams	Volume 7, Section 19.7	The Draft IS states that hydrologic studies have not been undertaken for the proposed port intake lakes or associated outlet streams and that lake recharge rates and the hydrologic characteristics of outlet streams are currently unknown. Despite this acknowledged information gap, the assessment relies on these waterbodies as potential Project water sources and presents conclusions regarding the magnitude and significance of Project-related effects on the aquatic environment. Without site-specific hydrologic information, it is difficult to evaluate the sustainability of proposed water withdrawals, the capacity of the lakes to support Project water demands, or the potential effects of water removal on lake levels, downstream flows, water quality, aquatic habitat, and connected ecosystems. Information regarding recharge rates, seasonal water balance, hydrologic connectivity, and outlet stream characteristics is necessary to understand how the lakes function within the broader watershed and to assess the potential consequences of Project-related water use. The absence of these data introduces uncertainty into the baseline characterization and limits the ability of reviewers to assess whether potential effects on aquatic resources have been adequately identified, quantified, and mitigated. It is therefore unclear how the Proponent determined that sufficient information exists to support the effects assessment and	1. The rationale for not completing hydrologic investigations at the port intake lakes and outlet streams is unclear. 2. The sustainability of proposed water withdrawals has not been demonstrated using site-specific recharge, water balance, connectivity, or streamflow data. 3. The assumptions, datasets, models, and surrogate information supporting the assessment are not clearly described. 4. Uncertainties resulting from the lack of site-specific hydrologic data have not been adequately assessed or incorporated into the effects assessment. 5. Potential effects on lake levels, downstream flows, water quality, fish habitat, aquatic ecosystems, and other water users have not been adequately demonstrated. 6. The scope, timing, and use of planned hydrologic studies have not been provided. 7. If no additional studies are planned, the adequacy of the existing information to support effects predictions and Project approval has not been justified.	The Proponent should provide the following for review: a) A detailed rationale for why hydrologic investigations were not undertaken at the proposed port intake lakes and associated outlet streams prior to completion of the Draft IS. b) An explanation of how the Proponent assessed the sustainability of proposed water withdrawals in the absence of information regarding lake recharge rates, seasonal water balance, hydrologic connectivity, and outlet stream characteristics. c) A description of the assumptions, datasets, models, or surrogate information used to support the assessment of potential effects associated with water withdrawal from the port intake lakes. d) An assessment of the uncertainty associated with the absence of site-specific hydrologic information and how this uncertainty was incorporated into the effects assessment and significance determinations. e) Information demonstrating that proposed water withdrawals will not adversely affect lake water levels, downstream flows, water quality, fish habitat, aquatic ecosystems, or other water users within the PDA and LAA. f) Details of any planned hydrologic studies for the port intake lakes and outlet streams, including study objectives, methodology, timing, and how the results will be used to refine the effects assessment, mitigation measures, water management plans, and monitoring programs. g) If hydrologic studies are not proposed, provide justification for why the existing information is considered sufficient to support Project approval and effects predictions related to water withdrawal.
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					associated conclusions regarding water withdrawal and aquatic ecosystem effects.		
NIRB	155.	West Kitikmeot Resources Corp.	Incomplete paragraphs	Volume 6	Sections of volume 6 appears to have been cut and pasted from another report with sentences not being complete. As an example, on p. 18-22 it states the following: "However, due to differences in methodology (as described in Gunn 1990). This best estimate cannot be directly compared with prior studies to establish a population trend."		Review and ensure the draft IS is complete
NIRB	156.	West Kitikmeot Resources Corp.	Project Environment and Impact Assessment	Vols. 5–9 VC assessments; Vol. 10, ss. 31–36; Vol. 11, management plans.	The IS contains discipline-specific baseline and effects assessments and supporting management plans. However, the effects information is distributed across volumes and not consistently consolidated by pathway, receptor, and management-plan dependency.	No single effects-to-mitigation-to-monitoring matrix shows, for each ecosystemic VC, the predicted effect, supporting evidence, mitigation relied upon, residual effect, monitoring program, threshold, and adaptive action.	Provide a consolidated Section 8 effects matrix for all ecosystemic VCs identifying: 1. project activity and phase; 2. effect pathway; 3. baseline receptor; 4. predicted effect; 5. mitigation; 6. residual effect and significance; 7. monitoring indicator; 8. threshold/action level; and 9. management plan responsible for implementation.
NIRB	157.	West Kitikmeot Resources Corp.	Ecosystemic Environment and Impact Assessment	Vol. 4, s. 9; Vols. 5–8 ecosystemic VC sections; Vol. 11 management plans.	Baseline and effects are presented for construction and operations, and some temporary construction areas are addressed. The assessment is weaker for reduced operations, temporary closure/care and maintenance, final closure, and post-closure for permanent infrastructure.	Effects and monitoring for temporary closure, final closure, post-closure, and long-term stewardship are not carried through consistently across ecosystemic VCs.	Provide a phase-completeness addendum for Section 8.1 showing how each ecosystemic VC is assessed for pre-construction, construction, operations, reduced operations, temporary closure/care and maintenance, final closure/decommissioning, reclamation, and post-closure monitoring. Identify any phase not assessed and provide a technical rationale.
NIRB	158.	West Kitikmeot Resources Corp.	Ecosystemic Environment and Impact Assessment	Vol. 4 methodology; Vol. 10 HHERA/human health references; Vols. 5–9 effects pathways.	The IS describes interactions and effects pathways in individual VC assessments and includes risk-assessment-related material, but a clearly presented integrated Conceptual Site Model linking sources, pathways, receptors, ecological risk, and human health risk is not evident as a stand-alone tool across Section 8.	The source-pathway-receptor relationships are not consolidated across air, dust, water, sediment, vegetation, wildlife, country foods, freshwater, marine, and human health receptors.	Provide an integrated Conceptual Site Model showing: 1. contaminant and non-contaminant sources; 2. transport pathways through air, water, soil, sediment, ice/snow, vegetation, wildlife, fish, and marine biota; 3. ecological and human receptors; 4. exposure routes; 5. risk endpoints; 6. monitoring locations; and 7. which IS sections and management plans address each pathway.

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NIRB	159.	West Kitikmeot Resources Corp.	Ecosystemic Environment and Impact Assessment	Vol. 4, ss. 9.2–9.4; Vols. 5–8 significance sections; Vol. 3 engagement; Vol. 11 monitoring plans.	VC indicators and significance criteria are described in the methodology and VC sections. The linkage between community-defined thresholds, significance criteria, and monitoring triggers is not consistently traceable.	Community involvement in selecting indicators and thresholds is described generally, but the IS does not consistently show which community inputs established or modified technical thresholds.	Provide a threshold traceability table for all ecosystemic VCs identifying: 1. indicator; 2. threshold or benchmark; 3. source of threshold; 4. community/IK input considered; 5. monitoring method; 6. adaptive management trigger; and 7. how exceedances will affect significance or mitigation.
NIRB	160.	West Kitikmeot Resources Corp.	Ecosystemic Environment and Impact Assessment	Vol. 2, s. 2.3 Future Development; Vol. 10 cumulative effects; Vols. 5–8 cumulative effects sections.	The IS identifies future and induced development scenarios, including third-party use and regional mineral development, and includes cumulative effects assessment. It is less clear how mitigation and monitoring would be coordinated if induced developments proceed.	No implementation framework is provided for aligning monitoring data, thresholds, reporting, or adaptive management with future third-party or induced developments.	Provide a regional coordination framework for induced development identifying: 1. foreseeable induced activities; 2. affected ecosystemic VCs; 3. shared monitoring opportunities; 4. data-sharing expectations; 5. cumulative effects triggers; 6. responsibilities of WKR and future users; and 7. how NIRB and affected communities will be notified if induced development materially changes predictions.
NIRB	161.	West Kitikmeot Resources Corp.	Air Quality	Vol. 5, s. 11.2, baseline air quality; Vol. 5 Appendix/Air Quality Technical Modelling Report.	The IS provides baseline and modelled air-quality information, but the remote project area has limited site-specific long-term ambient monitoring and relies substantially on representative/modelled conditions.	Baseline monitoring representativeness, seasonal variability, and uncertainty are not fully translated into monitoring commitments for the construction and operations periods.	Provide an air-quality baseline sufficiency addendum that identifies: 1. all baseline monitoring locations and periods; 2. parameters measured; 3. seasonal representativeness; 4. data gaps; 5. uncertainty in using modelled or regional data; and 6. how baseline limitations will be addressed through pre-construction and operational monitoring.
NIRB	162.	West Kitikmeot Resources Corp.	Air Quality	Vol. 5, s. 11.3; Air Quality Technical Modelling Report; Vol. 2 project components and traffic assumptions.	The assessment includes emissions from major construction and operations sources. However, several emissions depend on future design, final traffic/shipping assumptions, quarry sequencing, future third-party use, and operational controls.	Emission estimates are not fully traceable to final design assumptions for all future-ready facilities, third-party use, and induced traffic scenarios.	Provide an updated emissions inventory by phase and source category, including: 1. equipment, vehicle, aircraft, vessel, generator, incinerator, quarry, road, and wind erosion sources; 2. activity rates and emission factors; 3. mitigation/control efficiencies; 4. design assumptions; 5. third-party or future-use assumptions; and 6. sensitivity cases for higher traffic and quarry activity.
NIRB	163.	West Kitikmeot Resources Corp.	Air Quality	Vol. 5, Air Quality Technical Modelling Report, s. 7.1.2–7.1.4; Vol. 5, s. 11.3.	The modelling predicts exceedances for certain contaminants/averaging periods, including NO2 and PM metrics near the port and along Grays Bay. The assessment discusses mitigation but does not fully convert exceedance predictions into receptor-specific exposure controls and adaptive management.	Predicted exceedance areas are not fully integrated with land use, TLMRU, small-craft activity, camps, wildlife receptors, monitoring station siting, or action thresholds.	Provide revised air-quality model outputs and receptor analysis including: 1. isopleths for all relevant contaminants/averaging periods; 2. overlays with TLMRU, marine use, camps, roads, port, and wildlife areas; 3. receptor-specific exposure discussion; 4. monitoring station rationale; 5. action levels for NO2, PM10, PM2.5, TSP, SO2, CO, VOCs, and metals; and 6. operational responses to exceedances.

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NIRB	164.	West Kitikmeot Resources Corp.	Air Quality	Vol. 5, s. 11; Vol. 9 human health/food security sections; Vol. 10 human health and ecological risk references.	The IS compares modelled concentrations to applicable standards and discusses air quality effects. The connection to human health, country food confidence, vegetation, wildlife, and monitoring is not sufficiently consolidated.	Air contaminants, dust deposition, and metals are not presented in one pathway analysis linking air-quality changes to vegetation, water, wildlife, country foods, and human health monitoring.	Provide an air-quality pathway addendum linking predicted concentrations and dust deposition to: 1. human receptors; 2. land users and marine users; 3. vegetation and country foods; 4. wildlife and birds; 5. surface water and snowmelt; 6. monitoring parameters and locations; and 7. public communication procedures for exceedances.
NIRB	165.	West Kitikmeot Resources Corp.	Climate and Meteorology	Vol. 5, s. 12.2–12.4; Climate Profile and Climate Change Projections.	The IS includes a climate profile and regional climate projections. Because long-term site-specific climate observations are limited, technical review requires clear documentation of data sources and uncertainties for each project area and shipping route.	The degree to which non-site-specific meteorological data affects design, modelling, air quality, noise, hydrology, marine conditions, and climate risk is not clearly summarized.	Provide a climate and meteorology data-source table identifying: 1. each station/model/data product used; 2. period of record; 3. distance and representativeness; 4. parameters; 5. uncertainty; 6. application in each VC; and 7. implications for design and effects predictions.
NIRB	166.	West Kitikmeot Resources Corp.	Climate and Meteorology	Vol. 5, s. 12.3 Climate Summary; s. 12.4 Climate Change Projections; s. 12.5 Climate Change Risk Assessment.	The IS describes climate trends and future projections. The analysis does not consistently translate all high-risk climate hazards into specific monitoring triggers, asset-level design criteria, and residual risk for the full Project life.	Climate-risk implementation is not fully traceable from hazard to design standard, monitoring indicator, maintenance action, and residual risk.	Provide an asset-by-asset climate resilience table for road, water crossings, port, fuel systems, airstrip, quarries, camps, water/wastewater, and winter road. Include climate variables, design criteria, climate allowance, monitoring indicator, inspection frequency, action threshold, maintenance/adaptation response, and residual risk.
NIRB	167.	West Kitikmeot Resources Corp.	Climate and Meteorology	Vol. 5, GHG assessment; Vol. 5, s. 12; Vol. 10 conclusion.	The IS quantifies GHG emissions and discusses climate risk. The assessment provides limited detail on a long-term decarbonization pathway for a permanent/long-life infrastructure project, and on how emissions management will adapt over time.	Mitigation beyond tracking, equipment management, and conventional controls is not supported by a detailed reduction pathway, performance targets, or review schedule.	Provide a GHG management and decarbonization plan including: 1. annual emission estimates by phase and source; 2. diesel-generation alternatives considered; 3. feasible renewable/hybrid options; 4. reduction targets or justification for not setting them; 5. reporting commitments; 6. review triggers for technology changes; and 7. treatment of third-party users and future expansion.
NIRB	168.	West Kitikmeot Resources Corp.	Noise and Vibration	Vol. 5, s. 13.2 baseline; Vol. 6 wildlife sections; Vol. 8 marine mammal sections.	The IS includes a noise and vibration VC and discusses receptors across disciplines. Baseline noise/vibration information is not fully integrated across terrestrial, freshwater, marine, and human use receptors.	The assessment does not provide a consolidated receptor-based baseline and sensitivity table for people, caribou, birds, fish, marine mammals, and TLMRU users.	Provide a receptor-based noise and vibration baseline table identifying: 1. baseline values and locations; 2. seasonal variability; 3. sensitive species/receptors; 4. sensitive periods; 5. applicable thresholds; 6. uncertainty; and 7. how baseline conditions will be verified before construction.

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NIRB	169.	West Kitikmeot Resources Corp.	Noise and Vibration	Vol. 5, s. 13.3; Vol. 2 project activities; Vol. 8 underwater noise; Vol. 11 management plans.	The IS addresses major atmospheric and underwater noise sources, but final source levels and scenarios depend on detailed design, final traffic, blasting, quarry development, pile-driving/dredging decisions, and vessel schedules.	The current record does not provide a single source inventory with maximum, typical, seasonal, and worst-case source levels for all Project noise and vibration activities.	Provide an updated source inventory and modelling basis for noise and vibration including: 1. source sound/vibration levels; 2. operating assumptions; 3. simultaneous activity scenarios; 4. seasonal timing; 5. terrestrial and underwater propagation assumptions; 6. blasting/pile-driving/dredging confirmation; and 7. maps of predicted exceedance or disturbance zones.
NIRB	170.	West Kitikmeot Resources Corp.	Noise and Vibration	Vol. 5, s. 13; Vol. 6 ss. 16–17; Vol. 7 s. 20; Vol. 8 ss. 22–23; Vol. 11 WMMP/AEMP/Port Plan.	The assessment spreads receptor effects across multiple volumes and management plans. A technical reviewer must track how noise results feed into caribou disturbance, bird disturbance, fish blasting effects, marine mammal injury/behavioural thresholds, and TLMRU experience.	Cross-volume noise pathways are not consolidated, and management thresholds differ or are not finalized across plans.	Provide a consolidated noise/vibration effects crosswalk showing: 1. source; 2. receptor; 3. threshold/guideline; 4. predicted effect area; 5. mitigation; 6. monitoring; 7. shutdown or adaptive trigger; and 8. where the conclusion is assessed in the IS.
NIRB	171.	West Kitikmeot Resources Corp.	Terrestrial Environment	Vol. 6, s. 14 Terrain, Soils, and Permafrost; Vol. 9 heritage resources; Vol. 11 HRMP.	The IS provides terrain, soils, and permafrost assessment and discusses sensitive terrain. Paleontological and palaeobotanical resources are less clearly addressed, and heritage resources are partly dependent on future data and surveys.	Paleontological/palaeobotanical screening, survey requirements, and integration with terrain disturbance planning are not clearly presented as part of the terrestrial environment baseline.	Provide a terrestrial baseline addendum that includes: 1. mapping of eskers, wetlands, fragile landscapes, ice-rich terrain, thaw-sensitive slopes, taliks, and sensitive landforms; 2. protected/special areas; 3. paleontological/palaeobotanical potential; 4. survey requirements; 5. avoidance buffers; and 6. implications for final road, quarry, camp, and infrastructure siting.
NIRB	172.	West Kitikmeot Resources Corp.	Treatment of wetlands as a valued component	Vol 7 (Freshwater Environment); Vol 6, Section 15 (Vegetation)	Arising from KAA-35. Wetlands are not carried as a distinct VC despite their hydrological, sediment-trapping and contaminant-filtering functions, which are closely coupled to shallow groundwater and seasonal flow in permafrost terrain.	No wetland mapping for the Project area and no rationale for excluding wetlands as a distinct VC; consequent uncertainty in hydrological and ecological effects predictions.	Provide: (a) mapping of wetland extent within the PDA, LAA and RAA; (b) characterisation of wetland function and sensitivity, including linkage to shallow groundwater and seasonal flow; (c) the rationale for not carrying wetlands as a distinct valued component, having regard to the VC-selection criteria applied elsewhere in the IS; and (d) if wetlands are not adopted as a VC, an explanation of where wetland functions and effects upon them are assessed.
NIRB	173.	West Kitikmeot Resources Corp.	Terrestrial Environment	Vol. 6, s. 14.3–14.7; Vol. 2 road/quarry descriptions; Vol. 11 EPP, ESCP, Quarry Plan.	The IS identifies terrain and permafrost effects and acknowledges localized permafrost degradation. However, site-specific mitigation, final quarry/borrow design, culvert placement, and monitoring thresholds remain partly deferred.	Long-term permafrost, erosion, and drainage performance is not fully supported by a complete monitoring network with defined thresholds and corrective actions.	Provide a terrain/permafrost monitoring and adaptive management plan including: 1. monitoring locations; 2. ground-temperature and settlement instrumentation; 3. ice-rich terrain and slope monitoring; 4. erosion and ponding indicators; 5. thresholds for corrective action; 6. inspection frequency; 7. climate-change review triggers; and 8. reporting to regulators and communities.

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NIRB	174.	West Kitikmeot Resources Corp.	Landscape-scale, climate-driven permafrost degradation beyond infrastructure footprints	Vol 6, Section 14 (Terrain, Soils and Permafrost) and Appendix 14A; Guideline s. 8.1.4.2(vii)	Arising from KHTO-IR-004. The IS assesses permafrost principally at infrastructure sites for geotechnical stability and does not present numerical permafrost modelling across the corridor.	No landscape-scale numerical modelling of climate-driven permafrost degradation along the road corridor and surrounding terrain; no projection of ground thaw, terrain instability, or consequent surface-water change beyond the footprint.	Provide: (a) numerical permafrost/thaw modelling at landscape scale along the full road corridor and surrounding terrain, under the range of climate scenarios, as required by Guideline s. 8.1.4.2(vii); (b) projections of ground thaw, terrain instability, thermokarst and surface-water change beyond infrastructure footprints; (c) the resulting effects on VCs; and (d) monitoring triggers and response measures for thaw-related change outside the footprint. If landscape-scale modelling was not undertaken, provide the rationale and the basis on which effects were nonetheless predicted.
NIRB	175.	West Kitikmeot Resources Corp.	Terrestrial Environment	Vol. 6, s. 14 and s. 15; Vol. 9 food security/human health; Vol. 10 HHERA; Vol. 11 monitoring plans.	The IS discusses country foods and pathways in multiple sections. The required country-food exposure information is not sufficiently consolidated with contaminant lists, consumption frequency, and ecological/human health monitoring.	No single country-food contamination pathway table links Project contaminants to soil, water, vegetation, wildlife, fish, harvested parts, consumption frequency, and monitoring.	Provide a country-food exposure and monitoring addendum that identifies: 1. country foods consumed in the potentially affected area; 2. parts consumed and frequency where available; 3. contaminants of potential concern; 4. exposure pathways; 5. baseline contaminant data; 6. monitoring species/tissues; 7. communication protocols; and 8. adaptive actions if concentrations or concerns increase.
NIRB	176.	West Kitikmeot Resources Corp.	Terrestrial Environment	Vol. 6 ss. 14–17; Vol. 10 cumulative effects; Vol. 11 WMMP and management plans.	The IS assesses habitat alteration and sensory disturbance by VC. Cross-VC terrestrial system interactions are discussed but not always carried into significance determinations.	System-level terrestrial effects involving terrain, vegetation, dust, hydrology, caribou movement, birds, predators, and access are not consistently integrated.	Provide a terrestrial systems interaction matrix showing: 1. landform/permafrost changes; 2. hydrology and wetland changes; 3. vegetation and forage effects; 4. dust/contaminant pathways; 5. wildlife habitat and movement effects; 6. access/hunting pathways; and 7. how these interactions affect residual effects, mitigation, and monitoring.
NIRB	177.	West Kitikmeot Resources Corp.	Geological Features, Surficial and Bedrock Geology and Geochemistry	Vol. 6, s. 14; Vol. 2 quarry/borrow descriptions; Vol. 11 Borrow Pit and Quarry Management Plan; Vol. 11 ML/ARD-related measures.	The IS includes geology, terrain, permafrost, and quarry/borrow planning information. However, quarry sources are not fully finalized and geochemical testing/management is partly deferred to future quarry-specific planning.	The record does not provide a final quarry-by-quarry geochemical inventory and ARD/ML classification for all borrow and quarry materials that may be disturbed or used near water.	Provide a quarry and borrow geochemistry addendum including: 1. all proposed and contingency source areas; 2. lithology and material volume; 3. sampling density and results; 4. ARD/ML classification; 5. uncertainty for untested sources; 6. handling restrictions; 7. placement restrictions near water/high-water marks; and 8. monitoring and contingency measures.
NIRB	178.	West Kitikmeot Resources Corp.	Geological Features, Surficial and Bedrock Geology and Geochemistry	Vol. 6, s. 14; Vol. 7 s. 19; Vol. 10 effects of environment; Vol. 11 ESCP/Quarry Plan.	The IS identifies terrain and geohazard risks and water-resource interactions. Fault/fracture controls on contaminant transport and quarry-related drainage pathways require clearer site-specific analysis.	Potential subsurface contaminant transport pathways from fractured bedrock, taliks, and quarries are not fully characterized at the level needed for detailed water-quality and spill-risk review.	Provide a geologic contaminant transport assessment identifying: 1. faults/fractures near fuel, waste, quarry, water, and road infrastructure; 2. potential hydraulic connections to surface water; 3. talik interactions; 4. spill and seepage pathways; 5. monitoring wells or surface-water stations proposed; and 6. contingency actions.

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NIRB	179.	West Kitikmeot Resources Corp.	Geological Features, Surficial and Bedrock Geology and Geochemistry	Vol. 2 design basis; Vol. 6 s. 14; Vol. 10 effects of environment.	The IS provides project design and environmental baseline information, but some geotechnical and geochemical investigations are described as future or continuing with design advancement.	Detailed design may alter infrastructure locations, material sources, and mitigation requirements, which could affect the assessment conclusions.	Provide a design-uncertainty register for geology/geochemistry showing: 1. remaining investigations; 2. affected components; 3. potential design changes; 4. environmental effect implications; 5. decision thresholds requiring reassessment; and 6. when final results will be provided to NIRB.
NIRB	180.	West Kitikmeot Resources Corp.	Hydrological Features and Hydrogeology	Vol. 7, s. 19.2 baseline; Vol. 2 water crossings; Vol. 6 permafrost/talik discussion.	The IS contains water resources baseline information and crossing descriptions. The number, size, and location of some drainage equalization structures are still design-dependent.	Uncertainty in culvert/equalization structure locations affects drainage, wetland connectivity, fish passage, icing, permafrost, and road stability predictions.	Provide an updated water crossing and drainage inventory including: 1. all bridges, culverts, equalization structures, and in-stream works; 2. watershed/drainage area; 3. fish-bearing status; 4. design flow; 5. climate allowance; 6. icing risk; 7. permafrost/talik considerations; and 8. design status.
NIRB	181.	West Kitikmeot Resources Corp.	Hydrological Features and Hydrogeology	Vol. 7, s. 19.3.2; Vol. 2 roadway structures and crossings.	The IS considers hydrology and water crossings, but technical review requires final design criteria, climate-change allowance, and contingency procedures for blocked or undersized crossings.	The assessment does not fully specify adaptive responses if culverts cause ponding, erosion, icing, fish-passage obstruction, or altered wetland hydrology.	Provide crossing design criteria and contingency protocols including: 1. design storm/freshet events; 2. freeboard and capacity; 3. debris/ice management; 4. fish passage; 5. inspection schedule; 6. failure indicators; 7. emergency repair procedures; and 8. reporting requirements.
NIRB	182.	West Kitikmeot Resources Corp.	Hydrological Features and Hydrogeology	Vol. 7, s. 19.3; Vol. 11 Water Management Plan and AEMP.	The IS assesses water withdrawals, runoff, and drainage effects. The Water Management Plan and AEMP still require final monitoring locations, thresholds, and adaptive actions.	Source-specific withdrawal limits, under-ice withdrawal constraints, and watershed monitoring thresholds are not fully defined for all potential water sources.	Provide source-specific water management details including: 1. water source location; 2. expected daily/seasonal withdrawal; 3. EFN and under-ice volume calculations; 4. cumulative use assumptions; 5. monitoring locations; 6. shutdown thresholds; 7. alternate source contingency; and 8. reporting.
NIRB	183.	West Kitikmeot Resources Corp.	Hydrological Features and Hydrogeology	Vol. 6 s. 14; Vol. 7 s. 19; Vol. 5 climate risk assessment.	The IS identifies permafrost, talik, and icing considerations in several sections. It does not consistently provide crossing-specific talik/icing risk and monitoring triggers.	Potential interactions among culvert placement, ponding, winter icing, taliks, frost bulb formation, and permafrost degradation are not fully evaluated for each high-risk crossing.	Provide a crossing-specific permafrost/icing risk table identifying: 1. talik potential; 2. frost bulb and icing risk; 3. ponding/drainage risk; 4. monitoring indicators; 5. inspection timing; 6. design or maintenance controls; and 7. adaptive response thresholds.
NIRB	184.	West Kitikmeot Resources Corp.	Groundwater and Surface Water Quality	Vol. 7, s. 19.2; Appendix 19C Freshwater and Sediment Quality; Vol. 11 Water Management Plan.	The IS presents surface water and sediment baseline information. Groundwater baseline information appears more limited, reflecting permafrost and design-stage constraints.	Groundwater monitoring wells, hydraulic conductivity, detailed groundwater budget, potentiometric contours, and groundwater/surface-water interactions are not fully presented for all infrastructure areas.	Provide a groundwater and surface water baseline addendum including: 1. all drinking/recreational/harvesting water sources; 2. baseline chemistry and detection limits; 3. seasonal summary statistics; 4. groundwater monitoring well inventory or rationale if none exist; 5. hydraulic conductivity and groundwater budget; 6. potentiometric maps where applicable; and 7. groundwater-surface water interaction assessment.

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NIRB	185.	West Kitikmeot Resources Corp.	Groundwater and Surface Water Quality	Vol. 7, s. 19.3; Vol. 10 accidents/malfunctions; Vol. 11 Spill Contingency Plan, Water Management Plan, Waste Management Plan.	The IS identifies potential water-quality pathways and management measures, but source-pathway-receptor detail is not consolidated for fuel, chemicals, explosives, wastewater, quarry materials, road dust, incineration, and waste.	No complete COPC source-term map/table links each contaminant source to likely release pathways, receiving waters, groundwater/surface-water interactions, and monitoring.	Provide a water-quality COPC source-pathway-receptor table and maps for: 1. fuel systems; 2. chemical storage; 3. explosives/nutrient sources; 4. wastewater; 5. waste facilities; 6. quarry/borrow and road dust; 7. incineration deposition; 8. spills along transportation routes; and 9. monitoring stations and response actions.
NIRB	186.	West Kitikmeot Resources Corp.	Groundwater and Surface Water Quality	Vol. 7, s. 19.3.2–19.3.4; Vol. 11 Water Management, ESCP, Waste Management, Spill Contingency, AEMP.	The IS identifies these pathways, but many mitigation and monitoring details are in draft management plans and are not finalized.	The assessment relies on future plan completion for several key pathways, including dust-on-snow/meltwater, blasting nutrients, wastewater, and spill monitoring.	Provide pathway-specific water-quality monitoring and mitigation tables for under-ice withdrawals, wastewater, road dust/snowmelt, quarry runoff, blasting residues, erosion/sediment, spills, incineration deposition, and camps. Include monitoring locations, parameters, timing, thresholds, and corrective actions.
NIRB	187.	West Kitikmeot Resources Corp.	Sediment Quality	Vol. 7, Appendix 19C; Vol. 7 s. 19 baseline; Vol. 8 marine water and sediment baseline.	Freshwater and marine sediment quality data are presented, but sedimentation rates, dispersion patterns, and modelling rationale are not consistently developed for all affected waterbodies and marine areas.	The basis for where sediment modelling is or is not required is not clearly summarized for road crossings, quarry runoff areas, wastewater discharges, port construction, dredging/infill, and shipping-related disturbance.	Provide a sediment baseline and modelling rationale addendum identifying: 1. sampled freshwater and marine sediment locations; 2. physical/chemical results; 3. sedimentation and dispersion information; 4. potential sediment-source areas; 5. modelling completed or rationale for not modelling; and 6. monitoring locations and thresholds.
NIRB	188.	West Kitikmeot Resources Corp.	Sediment Quality	Vol. 7, s. 19.3; Vol. 8 s. 21 and s. 22; Vol. 11 ESCP/AEMP/Water Management Plan.	The IS assesses sediment quality effects and relies on erosion/sediment controls and AEMP monitoring. Some final design components, especially crossings, drainage structures, and marine construction details, remain uncertain.	Sediment monitoring and corrective action thresholds are not fully defined for freshwater receiving areas and marine construction/operations areas.	Provide a sediment effects and monitoring table by pathway and location, including road dust, runoff, crossings, wastewater discharge, quarry/borrow areas, port construction, dredging/infill if applicable, and shipping. Include thresholds, sampling frequency, methods, and adaptive responses.
NIRB	189.	West Kitikmeot Resources Corp.	Freshwater Aquatic Environment	Vol. 7, s. 20.2 baseline; Appendix 20A Freshwater Fish and Fish Habitat Baseline; Vol. 3 IK/engagement.	The IS provides freshwater fish and habitat baseline information. Some fish-bearing determinations and habitat functions may depend on field verification and final crossing design.	Technical review requires a clear table confirming fish-bearing status, habitat function, and survey confidence for each affected watercourse/waterbody crossing.	Provide a waterbody/crossing fish habitat inventory identifying: 1. fish-bearing status; 2. survey method and date; 3. habitat type/function; 4. species and life stages; 5. spawning/rearing/overwintering potential; 6. IK/community information; 7. confidence rating; and 8. whether additional field verification is required.

IR Source	IR #	IR Directed To	Subject	IS Reference Reviewed	Reviewer Comments / Reasoning	Missing Information / Gap	Information Requests / IR
NIRB	190.	West Kitikmeot Resources Corp.	Freshwater Aquatic Environment	Vol. 7, s. 20.3; Vol. 7 s. 19; Vol. 11 AEMP, Water Management Plan, Spill Contingency Plan.	The IS assesses freshwater fish and habitat effects. Several pathways depend on future management plans, final crossing design, final water-source selection, and offsetting/authorization decisions.	Effects conclusions rely on mitigation that is not fully specified in the AEMP and water/crossing design documents.	Provide a freshwater fish effects pathway table linking each activity to fish, habitat, water quality, sediment, passage, and mortality risk. Include mitigation, timing windows, residual effects, monitoring, thresholds, and contingencies for ineffective mitigation.
NIRB	191.	West Kitikmeot Resources Corp.	Freshwater Aquatic Environment	Vol. 7, s. 20.3; Vol. 2 roadway structures; Vol. 11 Road/Water Management Plans.	The IS identifies fish passage and water crossing considerations, but final crossing designs and drainage structures are not all finalized.	Fish-passage risk under extreme low/high flows, icing, debris blockage, and climate-change conditions is not fully documented for each crossing.	Provide a fish-passage assessment for each water crossing including: 1. fish-bearing status; 2. design flow and velocity; 3. low-flow and high-flow passage; 4. climate allowance; 5. icing/debris risk; 6. maintenance requirements; 7. monitoring methods; and 8. corrective actions.
NIRB	192.	West Kitikmeot Resources Corp.	Freshwater Aquatic Environment	Vol. 7, s. 20; Vol. 10 HHERA; Vol. 11 AEMP and management plans.	The IS addresses contaminants and management measures. The quantitative link between Project-generated contaminant loadings, fish health, country food consumption, and ecological risk is not fully transparent.	Freshwater contaminant risk is not consolidated with fish tissue monitoring, dust/snowmelt pathways, blasting residues, and human consumption of fish.	Provide a freshwater ecological risk addendum identifying: 1. COPCs; 2. predicted exposure concentrations; 3. fish/invertebrate receptors; 4. toxicity benchmarks; 5. fish tissue monitoring; 6. country food relevance; 7. invasive species prevention measures; and 8. adaptive management triggers.
NIRB	193.	West Kitikmeot Resources Corp.	Vegetation	Vol. 6, s. 15.2 baseline; Appendix 15A vegetation baseline; Vol. 3 IK/engagement.	The IS provides vegetation baseline and identifies vegetation SOCC, including rare plant concerns. Baseline contaminant information in plants consumed by wildlife/humans is not fully linked to future monitoring.	Vegetation contaminant baseline and country-food pathway monitoring are not sufficiently consolidated for lichen, berries, medicinal plants, and forage species.	Provide a vegetation baseline addendum for species used by wildlife and people, including: 1. species/location; 2. baseline chemistry where available; 3. soil/vegetation association; 4. Inuit use; 5. sensitivity to dust/metals; 6. monitoring species; and 7. action thresholds.
NIRB	194.	West Kitikmeot Resources Corp.	Vegetation	Vol. 6, s. 15.3; Vol. 5 air quality/dust; Vol. 7 water resources; Vol. 11 EPP/Reclamation/Management Plans.	The IS assesses vegetation loss and alteration, but interactions with dust deposition, permafrost, drainage, wetlands, and invasive species management require more operational detail.	Monitoring and management thresholds for dust-related vegetation effects, invasive species, wetland change, and forage quality are not fully specified.	Provide a vegetation monitoring plan including: 1. dustfall/metal monitoring near roads, quarries, and port; 2. vegetation condition plots; 3. wetland vegetation monitoring; 4. invasive species inspection and cleaning procedures; 5. forage quality monitoring; 6. thresholds; and 7. adaptive actions.
NIRB	195.	West Kitikmeot Resources Corp.	Vegetation	Vol. 6, s. 15; Table 15.11; Vol. 11 Progressive Reclamation Plan.	The IS identifies effects on plant SOCC and indicates potential mitigation such as avoidance, surveys, transplanting or seed collection. The effectiveness and enforceability of these measures are not fully demonstrated.	For rare plants, including long-stalked draba, the assessment lacks detailed avoidance feasibility, transplant/seed collection protocols, success criteria, and contingency measures.	Provide a rare plant mitigation plan including: 1. pre-construction survey design; 2. avoidance hierarchy; 3. micro-siting procedures; 4. seed collection/transplant protocols; 5. qualifications of botanists; 6. success criteria and monitoring duration; 7. contingency measures; and 8. revised significance if avoidance is not possible.

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NIRB	196.	West Kitikmeot Resources Corp.	Vegetation — significance-determination logic for plant Species of Conservation Concern (long-stalked draba)	Vol 6, Section 15 (Vegetation); Appendices 15A and 15B	The IS assigns a "not significant" residual-effect rating to plant SOCC including long-stalked draba, but (a) occurrence within the PDA is not confirmed by field survey, and (b) the mitigation on which the rating appears to rely (avoidance, micro-siting, transplant/seed collection) is proposed but not committed. Per Guidelines s. 7.4.6, a significance determination must not rest on unverified baseline or uncommitted mitigation. This is the VEG-2 non-conformance. Existing NIRB-IRs #193 and #195 address the vegetation baseline addendum and a rare-plant mitigation plan but do not test the significance-determination logic itself. Following review of parties' IRs: ADNLC-IR-13 asks the equivalent question for caribou and specifies a clearer output — a table showing, for each mitigation measure relied upon, the significance rating BEFORE mitigation, how the measure was determined to change the effect, and how that change was weighted in the final determination. That format is adopted here for plant SOCC. See also BQCMB-IR-006 paras. 2-4.	The reasoning chain from residual effect to "not significant" is not traceable, and the ratings apparent dependence on uncommitted mitigation and unconfirmed occurrence is not disclosed.	Provide the explicit significance-determination reasoning for each plant SOCC, showing: the residual effect before and after mitigation; whether the "not significant" rating depends on mitigation that is not yet committed; and how unconfirmed PDA occurrence was treated (precautionary presence assumption vs. confirmed absence by survey). If the rating depends on uncommitted mitigation, either formally commit to that mitigation or revise the significance rating accordingly. Present the result as a table with one row per mitigation measure relied upon, showing: (i) the residual-effect rating BEFORE that mitigation; (ii) the evidence that the measure changes the effect and by how much; (iii) whether the measure is a committed Project commitment or only proposed; and (iv) how the change was weighted in the final significance determination. Where the IS already contains this information, cross-reference the section for each row.
NIRB	197.	West Kitikmeot Resources Corp.	Vegetation	Vol. 11 Progressive Reclamation Plan; Vol. 11 Environmental Protection Plan; Vol. 6 s. 15.	Progressive reclamation is addressed, but permanent infrastructure means large areas will remain disturbed or inaccessible for reclamation. Reclamation objectives and success criteria require more detail for temporary construction areas, quarries, roadsides, and laydowns.	The IS does not fully define vegetation end-points, success criteria, monitoring duration, seed/plant material sources, and long-term responsibilities.	Provide progressive reclamation and revegetation details including: 1. disturbance types and areas; 2. soil salvage and storage; 3. revegetation methods; 4. seed/propagule sources; 5. invasive species controls; 6. success criteria; 7. monitoring schedule; and 8. contingency actions if revegetation fails.

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NIRB	198.	West Kitikmeot Resources Corp.	Terrestrial Wildlife and Wildlife Habitat	Vol. 6, s. 16 caribou; s. 17 birds; Appendix 16A and wildlife baselines; Vol. 3 IK/engagement.	The IS provides extensive wildlife baseline, especially for caribou and birds. Some information is inherently uncertain due to changing caribou ranges, cyclic populations, collar availability, and regional cumulative pressures.	Baseline uncertainty for caribou range shifts, migration timing, population status, collar-data coverage, predator-prey dynamics, and harvesting pressure is not fully converted into precautionary thresholds.	Provide a wildlife baseline uncertainty table identifying: 1. dataset/source; 2. temporal/spatial coverage; 3. limitations; 4. affected prediction; 5. confidence; 6. monitoring needed; and 7. precautionary mitigation triggered by uncertainty.
NIRB	199.	West Kitikmeot Resources Corp.	Terrestrial Wildlife and Wildlife Habitat	Vol. 6, s. 16; Vol. 10 cumulative/transboundary effects; Vol. 11 WMMP and Road Management Plan.	The IS assesses caribou effects and provides mitigation concepts including road management and a TARP. The operational details of caribou protection measures are central to the not-significant conclusion and require further specificity.	The caribou TARP and access controls are not yet sufficiently detailed for enforceability, decision authority, data sources, thresholds, closure/reopening criteria, and monitoring/reporting.	Provide the complete caribou TARP and road access protocol including: 1. herd-specific triggers; 2. collar-data and observation procedures; 3. closure, speed, convoy, blasting, aircraft, and work restrictions; 4. decision authority; 5. reopening criteria; 6. community/regulator notification; 7. illegal harvest monitoring; and 8. annual reporting.
NIRB	200.	West Kitikmeot Resources Corp.	Terrestrial Wildlife and Wildlife Habitat	Vol. 6, s. 16 harvest/access effects; Vol. 9 TLMRU; Vol. 11 Road Management Plan; Vol. 3 engagement.	The IS recognizes improved access and proposes controlled road access, but the governance of harvesting access and enforcement is not fully defined.	Roles, authority, funding, monitoring, denial/appeal processes, and coordination with KIA, HTOs, GN, and enforcement bodies are not fully specified.	Provide an access and harvest management framework identifying: 1. who can access the road; 2. harvesting approval process; 3. role of KIA/HTOs/GN/WKR; 4. enforcement authority and funding; 5. monitoring of traffic and harvest pressure; 6. response to illegal harvest or meat wastage; and 7. protection of Inuit rights and emergency access.
NIRB	201.	West Kitikmeot Resources Corp.	Terrestrial Wildlife and Wildlife Habitat	Vol. 6, s. 16; Vol. 10 cumulative effects; Vol. 11 WMMP/Road Management Plan.	The IS addresses wildlife movement and predation pathways. However, predator mobility along the road corridor and packed snow/linear access effects require clearer monitoring and adaptive-management triggers.	The assessment does not fully define how predator use of roads, snowbanks, quarries, camps, or waste areas will be monitored and mitigated in relation to caribou vulnerability.	Provide a predator-prey monitoring plan including: 1. road and snow-compaction monitoring; 2. predator track/camera surveys; 3. waste/attractant controls; 4. caribou proximity triggers; 5. road-closure or snow-management measures; 6. thresholds for increased predator activity; and 7. reporting to wildlife co-management bodies.

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NIRB	202.	West Kitikmeot Resources Corp.	Caribou — Dolphin and Union (DU) herd population projection not run/reported for the Endangered herd (not covered by any other party following review of parties' IRs)	Vol 6, Section 16 (Terrestrial Wildlife – Caribou); Appendix 16B (Caribou Herd Vulnerability Model / CCE model)	Following review of parties comments, it is noted that BQCMB-IR-006 para. 6 asks whether the behavioural/energetic assumptions were validated for the Bathurst, Beverly/Ahiak or DU herds or transferred from other herds (covers the Central Arctic Herd calf-survival transfer); BQCMB-IR-006 paras. 2-3 ask why predicted population change, demographic risk and calf survival did not inform the "not significant" determination; KAA-24 and KAA-27 cover parameter uncertainty and model validation history. What remains uncovered by any party is a request that the DU population sub-model actually be RUN and REPORTED for the Endangered herd. GoC-IR 02 addresses herd selection and spatial scope, not the population model.	No party IR requires the DU herd population/demographic projection to be produced and reported under Project and cumulative scenarios. Parties ask how the model results were used, weighted and validated — not for the DU projection itself.	Provide the Dolphin and Union herd population/demographic projection outputs from the Caribou Herd Vulnerability Model (Appendix 16B) under (a) baseline, (b) Project-only, and (c) cumulative scenarios including the Slave Geological Province Road/Corridor scenario, reported at the same level of detail as presented for the Bathurst herd. State explicitly whether the population sub-model was run for the DU herd and, if it was not, provide the rationale. Re-state the significance determination for the DU herd (COSEWIC Endangered) in light of those outputs. Cross-reference BQCMB-IR-006 paras. 2, 3 and 6 rather than duplicating them.
NIRB	203.	West Kitikmeot Resources Corp.	Predator-prey effects of linear infrastructure and snow compaction	Vol 6, Section 16 (Caribou) and Section 18 (Other Terrestrial Wildlife)	Arising from KHTO-IR-006. The IS does not assess how the road as a linear feature, and associated snow compaction, may increase predator mobility and predation pressure on caribou during sensitive periods. Overlaps YKDFN and NIRB wildlife IRs.	No assessment of altered predator-prey dynamics attributable to linear infrastructure and snow compaction along the corridor.	Provide an assessment of the potential for the road corridor and associated snow compaction (including snow banks, plough windrows and compacted travel surfaces) to facilitate predator movement and access, and the resulting change in predation pressure on caribou during calving, post-calving and winter periods. Include the evidentiary basis, any zone of influence applied, and the consequences for the herd-level effects conclusions.
NIRB	204.	West Kitikmeot Resources Corp.	Effects of enabled mine and mine-site infrastructure on caribou	Vol 4 (cumulative effects — Project Inclusion List); Vol 6, Section 16 (Caribou)	Arising from KHTO-IR-008. The Project is premised on enabling mineral development, but the IS does not assess mine and mine-site infrastructure effects on caribou.	Mine and mine-site activities enabled by the Project are not assessed for caribou habitat loss, sensory disturbance or access effects.	Provide an assessment of the potential effects on caribou of the mine and associated mine infrastructure that the Project is intended to enable, during construction and operation, addressing habitat loss and alteration, noise, dust, vibration and increased access. Where such developments are excluded from the Project Inclusion List, provide the rationale for exclusion against the reasonably-foreseeable test.

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NIRB	205.	West Kitikmeot Resources Corp.	Birds and Bird Habitat	Vol. 6, s. 17 birds; Appendix 17A bird baseline; Vol. 8 marine environment; Vol. 10 accidents/malfunctions.	The IS assesses birds and bird habitat. The connection between terrestrial bird habitats, marine/coastal bird areas, shipping routes, and spill vulnerability requires clearer consolidation.	Key migratory bird sites and spill-sensitive coastal/marine bird areas along shipping routes are not summarized in one risk map tied to marine spill scenarios.	Provide a bird habitat and spill vulnerability map set showing: 1. breeding/nesting/staging areas; 2. raptor nests and buffers; 3. marine/coastal bird concentration areas; 4. key migratory bird sites; 5. shipping routes and anchorages; 6. spill trajectory/sensitive shoreline areas where available; and 7. seasonal sensitivity.
NIRB	206.	West Kitikmeot Resources Corp.	Birds and Bird Habitat	Vol. 6, s. 17; Vol. 5 noise/air quality; Vol. 7 water resources; Vol. 8 marine shipping.	The IS assesses direct and indirect effects on birds. Flight impacts, lighting, aircraft routes, low-level flights, and energy-balance consequences for sensitive species require more operational detail.	Operational flight zones, low-level flight restrictions, lighting controls, and monitoring of collision/attraction effects are not fully specified.	Provide a bird disturbance and collision management plan including: 1. flight routes and altitude restrictions; 2. low-level flight avoidance during nesting/moulting; 3. lighting specifications; 4. collision/strike monitoring; 5. nest survey and buffer procedures; 6. shutdown or activity modification triggers; and 7. reporting.
NIRB	207.	West Kitikmeot Resources Corp.	Birds and Bird Habitat	Vol. 6, s. 17; Vol. 11 Waste Management Plan, EPP, WMMP.	The IS identifies waste and attractant controls. Detailed performance requirements are needed because predator/scavenger attraction could indirectly affect migratory birds and nesting success.	The assessment lacks specific thresholds for raven/gull/fox/bear attraction, nesting on structures, and corrective action if attractant issues occur.	Provide bird/predator attractant control procedures including: 1. waste handling standards; 2. inspection frequency; 3. thresholds for predator/scavenger activity; 4. nest prevention/removal procedures consistent with permits; 5. facility design measures; and 6. incident reporting.
NIRB	208.	West Kitikmeot Resources Corp.	Birds and Bird Habitat	Vol. 6, s. 17; Vol. 8 marine environment; Vol. 10 cumulative/accident assessments; Vol. 11 Port Management Plan.	The IS considers shipping, cumulative effects, and accidents/malfunctions. Third-party and future vessel traffic assumptions and marine-bird mitigation/monitoring remain important uncertainties.	Marine bird monitoring, spill response priorities, vessel disturbance thresholds, and cumulative vessel-traffic triggers are not fully defined.	Provide a marine bird monitoring and mitigation program including: 1. vessel traffic scenarios; 2. marine bird survey methods; 3. spill-sensitive bird areas; 4. vessel disturbance mitigation; 5. collision/stranding reporting; 6. cumulative traffic thresholds; and 7. integration with Port and Spill Response Plans.
NIRB	209.	West Kitikmeot Resources Corp.	Marine Environment	Vol. 8, s. 21 Marine Water and Sediment; s. 22 Marine Fish and Habitat; Appendix marine baseline studies.	The IS provides marine baseline information and physical environment characterization. Some key design elements, including final outfall, dredging/infill requirements, and detailed third-party operations, remain unresolved.	Baseline interpretation and effects predictions may change if final port design, outfall/diffuser configuration, dredging, or vessel operation assumptions change.	Provide a marine design-update addendum confirming: 1. final port footprint; 2. dredging/infill requirements; 3. outfall location/design; 4. diffuser if any; 5. vessel routes/anchorages; 6. marine construction methods; and 7. whether updated marine baseline/effects analysis is required.
NIRB	210.	West Kitikmeot Resources Corp.	Marine Environment	Vol. 8, s. 21; Vol. 10 accidents/cumulative/transboundary; Vol. 11 AEMP, Port Plan, Water Management Plan, Spill Contingency Plan.	The IS assesses marine water and sediment quality and includes preliminary effluent modelling. The AEMP and operational discharge criteria require further detail.	Marine monitoring stations, discharge criteria, seasonal/ice-covered conditions, and adaptive responses are not fully finalized.	Provide a marine water/sediment monitoring program including: 1. discharge sources and criteria; 2. open-water and ice-covered season assumptions; 3. mixing zone rationale; 4. monitoring stations inside/outside mixing zones; 5. parameters including salinity, TSS, nutrients, metals, ammonia, BOD, pathogens, and treatment chemicals; 6. thresholds; and 7. adaptive responses.

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NIRB	211.	West Kitikmeot Resources Corp.	Marine Environment	Vol. 8, s. 22 Marine Fish and Fish Habitat; Vol. 8 s. 23 Marine Mammals; Vol. 11 DFO Offsetting Plan.	The IS assesses marine fish and habitat effects, including potential habitat loss. The offsetting plan remains insufficiently developed to support the residual effects conclusion.	Marine habitat loss, HADD quantification, offset options, ratios, effectiveness monitoring, and contingency measures are not fully provided.	Provide a marine fish habitat loss and offsetting addendum including: 1. final habitat-loss area by habitat type/function; 2. species and life stages affected; 3. HADD assessment; 4. offset options and rationale; 5. offset ratios and uncertainty; 6. implementation schedule; 7. monitoring; and 8. contingencies if offsets underperform.
NIRB	212.	West Kitikmeot Resources Corp.	Marine Environment	Vol. 8, marine shipping sections; Vol. 10 cumulative and transboundary effects; Vol. 2 future development.	The IS includes vessel traffic and cumulative/transboundary assessment. Future third-party use and induced development may increase vessel traffic, but compliance mechanisms and cumulative thresholds are not fully specified.	Vessel traffic forecasts, third-party controls, cumulative marine disturbance thresholds, and transboundary reporting commitments are incomplete.	Provide a marine traffic and cumulative effects addendum including: 1. annual vessel numbers by phase and scenario; 2. vessel class/speed/season; 3. third-party use assumptions; 4. compliance mechanisms; 5. cumulative effects thresholds; 6. monitoring metrics; and 7. reporting to regulators, communities, and transboundary parties.
NIRB	213.	West Kitikmeot Resources Corp.	Marine Wildlife	Vol. 8, s. 23 Marine Mammals; Vol. 8 marine baseline; Vol. 3 IK/engagement.	The IS identifies marine mammals and baseline information. Technical review requires clearer integration of Inuit/community observations, seasonal use, vessel routing, and sensitive periods into operational mitigation.	The record does not fully show how marine mammal sensitive periods and Inuit/community knowledge determine vessel timing, routing, shutdown zones, or monitoring intensity.	Provide a marine wildlife baseline integration table showing: 1. species; 2. seasonal presence; 3. sensitive areas/timing; 4. IK/community observations; 5. vessel/construction interaction; 6. mitigation; 7. monitoring intensity; and 8. uncertainty.
NIRB	214.	West Kitikmeot Resources Corp.	Marine Wildlife	Vol. 8, s. 23.3; Vol. 5 noise; Vol. 11 Port Management Plan/AEMP.	The IS assesses underwater noise and uses available thresholds. Some high-risk activities such as impact pile driving, in-water blasting, or dredging are not fully confirmed in final design.	Acoustic predictions and mitigation zones may change depending on final construction methods and source levels.	Provide final activity-specific underwater noise modelling for pile driving, blasting, dredging, vessel operations, and aircraft where relevant. Include source levels, propagation assumptions, injury/behavioural zones by species group, mitigation/shutdown zones, monitoring methods, and restart criteria.
NIRB	215.	West Kitikmeot Resources Corp.	Marine Wildlife	Vol. 8, s. 23; Vol. 10 accidents/malfunctions and transboundary effects; Vol. 11 Port Plan and Spill Response Plans.	The IS assesses vessel and spill risks, but remote Arctic spill response and third-party vessel compliance require greater detail.	Marine mammal avoidance measures, vessel speed/routing compliance, near-miss reporting, and spill response priorities are not fully operationalized.	Provide a marine wildlife protection plan including: 1. vessel speed and routing requirements; 2. marine mammal observer procedures; 3. avoidance distances; 4. strike/near-miss reporting; 5. third-party compliance; 6. spill response wildlife priorities; 7. shoreline protection priorities; and 8. adaptive measures if displacement or strike risk increases.
NIRB	216.	West Kitikmeot Resources Corp.	Marine Wildlife	Vol. 8, s. 23 cumulative effects; Vol. 10 cumulative and transboundary effects; Vol. 2 future development.	The IS includes cumulative and transboundary considerations for marine mammals. Future vessel traffic from induced development and third-party users may increase underwater noise, displacement, and strike risk.	No clear cumulative marine wildlife threshold or adaptive management trigger is provided for increased vessel traffic or altered seasonal use.	Provide cumulative marine wildlife thresholds and monitoring including: 1. vessel traffic triggers; 2. acoustic monitoring triggers; 3. marine mammal sighting and behaviour indicators; 4. spatial/seasonal avoidance criteria; 5. transboundary communication; and 6. additional mitigation if monitoring shows displacement, repeated disturbance, or increased strike risk.

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NIRB	217.	West Kitikmeot Resources Corp.	Socio-Economic Environment and Impact Assessment	Vol. 9, Volume Summary; Vol. 9, ss. 24–30; Vol. 10, ss. 31–33; Vol. 11, Appendix 37K Socio-economic Monitoring Plan (Draft).	The IS provides a full human-environment volume with dedicated sections for TLMRU, food security, community health and well-being, employment/economy, infrastructure/services, non-traditional use, and heritage resources. The socio-economic assessment is extensive, but the implementation link between predicted effects, mitigation/enhancement, monitoring indicators, thresholds, and adaptive management is not consistently complete.	No single socio-economic effects-to-mitigation-to-monitoring matrix consolidates all adverse and beneficial effects by community, phase, receptor group, mitigation measure, monitoring indicator, threshold, and responsible plan.	Provide a consolidated socio-economic effects matrix identifying: 1. each socio-economic VC and effect pathway; 2. affected communities and sub-populations; 3. project phase; 4. predicted adverse and beneficial effects; 5. mitigation/enhancement measures; 6. residual effect characterization and significance; 7. monitoring indicators; 8. thresholds/action levels; 9. responsible party; and 10. reporting/adaptive-management response.
NIRB	218.	West Kitikmeot Resources Corp.	Socio-Economic Environment and Impact Assessment	Vol. 9, ss. 24–30; Vol. 2 project phases; Vol. 11 management plans; Vol. 1/Vol. 2 statements that operations continue in perpetuity.	Construction and operations are assessed throughout Volume 9. However, because the Project is described as permanent infrastructure operating in perpetuity, socio-economic effects associated with reduced operations, temporary closure, care and maintenance, final closure, transfer, abandonment, or long-term post-closure stewardship are not consistently assessed.	The IS does not provide a complete socio-economic phase matrix for reduced operations, temporary closure, final closure, post-closure, or a scenario where permanent infrastructure ceases to operate or changes ownership.	Provide a socio-economic phase-completeness addendum that evaluates each Volume 9 VC for: 1. pre-construction; 2. construction; 3. operations; 4. reduced operations; 5. maintenance/modifications; 6. care and maintenance; 7. final closure/decommissioning/reclamation; and 8. post-closure or long-term stewardship. Include effects, mitigation, monitoring, responsibilities, and residual conclusions for each phase.
NIRB	219.	West Kitikmeot Resources Corp.	Socio-Economic Environment and Impact Assessment	Vol. 9, Volume Summary; Vol. 9, ss. 24.2, 25.2, 26.2, 27.2, 28.2; Vol. 3 engagement and knowledge integration.	The IS describes the mixed economy, land-based activities, wage employment, food systems, health and well-being, infrastructure, and community context. However, interactions among these components are not always carried through into residual-effects conclusions or monitoring design.	The link between effects on wildlife/access, food security, mental health, employment, family dynamics, infrastructure, and cultural continuity is described narratively but not consistently analyzed as an integrated socio-economic system.	Provide a socio-economic systems interaction matrix showing: 1. key pathways linking land/water/wildlife effects to TLMRU, food security, health, employment, and infrastructure; 2. how these interactions were considered in each residual-effects conclusion; 3. where interactions increase or reduce effect magnitude; and 4. integrated monitoring indicators for cumulative community-level effects.

IR Source	IR #	IR Directed To	Subject	IS Reference Reviewed	Reviewer Comments / Reasoning	Missing Information / Gap	Information Requests / IR
NIRB	220.	West Kitikmeot Resources Corp.	Socio-Economic Environment and Impact Assessment	Vol. 9, ss. 25.2.3, 27.2.3, 28.2.3; Vol. 9, ss. 24–30 baseline methods; Vol. 11, Appendix 37K SEMP (Draft).	Several Volume 9 sections include GBA+ summaries, and some sub-population information is discussed. However, the availability, consistency, and use of gender-, age-, harvester-, household-, and vulnerable-group-specific data vary across VCs, and the consequences of data limitations are not consistently carried into confidence ratings or monitoring.	The IS does not provide a consolidated GBA+ data inventory showing which socio-economic indicators are disaggregated, where data are missing, and how gaps affect predictions for vulnerable or differently affected groups.	Provide a GBA+ and sub-population data-gap table for all Section 8.2 VCs that identifies: 1. indicator; 2. source; 3. community coverage; 4. gender/age/harvester/youth/elder/household/vulnerable-group disaggregation; 5. limitations; 6. effect prediction implications; and 7. monitoring actions to fill gaps.
NIRB	221.	West Kitikmeot Resources Corp.	Economic Development and Opportunities	Vol. 9, s. 27.2 Baseline Conditions, pp. 27-14–27-44; Vol. 9, s. 24.2 TLMRU baseline; Vol. 9, s. 25.2 food security baseline.	The IS provides baseline economic and employment information and describes the traditional and wage economies. It also discusses food systems and TLMRU in separate sections. However, the baseline is not consolidated to show community-level interaction between renewable-resource use, wage income, self-reliance, country food replacement value, and macroeconomic indicators.	The traditional economy and wage economy are treated across multiple sections, but the economic value and dependency relationships are not fully integrated into one baseline suitable for assessing community-level economic resilience.	Provide an integrated economic baseline table by community that includes: 1. wage economy indicators; 2. traditional/country-food economy indicators; 3. renewable-resource economic roles; 4. self-reliance indicators; 5. country food replacement value where available; 6. local and regional economic constraints; and 7. limitations in baseline data.
NIRB	222.	West Kitikmeot Resources Corp.	Economic Development and Opportunities	Vol. 9, ss. 27.3.3 and 27.4.2, pp. 27-54–27-64 and 27-101–27-104; Vol. 10, s. 32 cumulative effects; Vol. 2, s. 2.3 future development.	The IS predicts substantial economic benefits and improved economic development opportunities. However, beneficial effects are not always characterized with the same detail as adverse effects, and potential adverse consequences such as increased dependency on future mineral development, inflationary pressures, labour competition, and closure/reduced-operation effects are less developed.	Economic benefits are not consistently assessed for distribution, certainty, durability, equity, sensitivity to future development assumptions, or risks if induced development, third-party use, or long-term operations do not occur as assumed.	Provide an economic development effects addendum that includes: 1. quantitative and qualitative assessment of benefit distribution by community and group; 2. sensitivity analysis for third-party/induced development assumptions; 3. effects on traditional economic activities; 4. inflation/CPI and local cost-of-living implications; 5. economic diversity risks; 6. temporary closure/final closure effects; and 7. monitoring indicators for durable regional benefits.

IR Source	IR #	IR Directed To	Subject	IS Reference Reviewed	Reviewer Comments / Reasoning	Missing Information / Gap	Information Requests / IR
NIRB	223.	West Kitikmeot Resources Corp.	Employment	Vol. 9, ss. 27.2.2–27.2.3, pp. 27-18–27-44; Vol. 9, s. 27.3.4, pp. 27-65–27-80; Vol. 11, Appendix 37J Inuit Human Resources and Business Development Plan (Draft).	The IS provides labour-force, income, employment, and Inuit employment context, and recognizes barriers. The Inuit Human Resources and Business Development Plan is draft. The baseline does not fully demonstrate the match between available workers and project-specific job requirements by phase, occupation, education, certification, criminal record requirements, language, rotation, and family responsibilities.	A detailed labour-market gap analysis connecting project job demand to local and Inuit labour availability, barriers, and training timelines is not provided in a single auditable format.	Provide a project labour-demand and local-labour-availability matrix by phase and occupation, including: 1. number of positions; 2. required education/certification/experience; 3. drug/alcohol, security, language, and record requirements; 4. available Inuit/Nunavummiut labour supply; 5. barriers; 6. training lead time; 7. expected local/Inuit hiring; and 8. mitigation for gaps.
NIRB	224.	West Kitikmeot Resources Corp.	Employment	Vol. 9, s. 27 employment and economy; Vol. 9, s. 26 community health and well-being; Vol. 9, s. 28 infrastructure and housing; Vol. 11, Appendix 37K SEMP (Draft).	The IS acknowledges potential income-related effects, including benefits and risks such as substance use, financial stress, and housing pressures. However, the specific Guideline topic of income effects on public housing rent, savings, expenditure patterns, and household consumption is not clearly assessed in detail.	The assessment does not provide a community-specific analysis of how project income may affect public housing rent calculations, household disposable income, sharing obligations, debt, savings, financial management, or family stress.	Provide an income-effects addendum assessing: 1. expected income changes by worker group; 2. interaction with public housing rent and social assistance rules; 3. effects on savings, debt, remittances, sharing, and household consumption; 4. financial management supports; 5. community-specific risk indicators; and 6. monitoring through the SEMP.
NIRB	225.	West Kitikmeot Resources Corp.	Education and Training	Vol. 9, ss. 27.2.2–27.2.3, pp. 27-18–27-44; Vol. 9, s. 27.3.5, pp. 27-81–27-84; Vol. 11, Appendix 37J.	The IS describes education, training, and labour-force characteristics in the employment and economy assessment. However, education-system capacity, funding resources, administrative capacity, and demographic skill profiles are not consistently presented in a way that directly supports evaluation of training feasibility and project demand.	The baseline does not fully link existing education/training capacity and participant readiness to the scale, schedule, and skill requirements of construction and operations employment.	Provide an education and training baseline addendum that includes: 1. community education levels by demographic group; 2. current training programs and capacity; 3. barriers to participation; 4. infrastructure/funding/administration capacity; 5. language and cultural barriers; 6. training provider roles; and 7. data gaps.

IR Source	IR #	IR Directed To	Subject	IS Reference Reviewed	Reviewer Comments / Reasoning	Missing Information / Gap	Information Requests / IR
NIRB	226.	West Kitikmeot Resources Corp.	Contracting and Business Opportunities	Vol. 9, ss. 27.2 and 27.3.6, pp. 27-14–27-44 and 27-85–27-88; Vol. 11, Appendix 37J.	The IS discusses business opportunities and procurement benefits. However, the baseline does not fully quantify current Inuit, local, regional, territorial, and transboundary business capacity to meet project demand by category, scale, timing, and barrier.	The IS does not include a detailed procurement-capacity gap analysis linked to the project procurement schedule and local business-development measures.	Provide a contracting baseline and capacity assessment that identifies: 1. procurement categories by project phase; 2. estimated contract values/volumes; 3. local/Inuit/regional business capacity; 4. barriers to participation; 5. bonding/insurance/equipment/financing needs; 6. country-food supply feasibility; and 7. data limitations.
NIRB	227.	West Kitikmeot Resources Corp.	Population Demographics	Vol. 9, ss. 26.2, 27.2, and 28.2 baseline conditions; Vol. 3 regional historical overview; Vol. 9, Volume Summary.	The IS provides demographic and community baseline information across health, economy, infrastructure, and knowledge/engagement sections. However, demographic indicators are dispersed and not consistently linked to population mobility, worker in/out flows, household composition, and service demand.	A consolidated demographic baseline by potentially affected community, including migrant/worker-flow assumptions and demographic vulnerability factors, is not provided.	Provide a consolidated demographic baseline table by community including: 1. population trends; 2. age/gender structure; 3. household composition; 4. education and diet indicators; 5. relevant cultural/social factors; 6. worker mobility patterns; 7. vulnerable groups; and 8. baseline limitations.
NIRB	228.	West Kitikmeot Resources Corp.	Population Demographics	Vol. 9, ss. 26.3, 27.3, 28.3; Vol. 9, s. 26.3.6 family/community dynamics; Vol. 9, s. 28.3 infrastructure/housing; Vol. 11 SEMP.	The IS discusses worker movement, rotational work, service demand, housing, and community health effects. However, it does not clearly present a demographic-change model or quantify worker transit, in-migration, community redistribution, non-resident interactions, and closure-related unemployment scenarios.	The assessment lacks a transparent demographic assumptions table connecting workforce, travel, housing, service demand, and socio-cultural interaction effects.	Provide a demographic effects addendum including: 1. workforce and travel-flow assumptions; 2. expected local, Nunavut, out-of-territory, and foreign-worker shares; 3. in-migration/redistribution scenarios; 4. non-resident interaction pathways; 5. effects on housing, services, and community safety; 6. temporary/final closure unemployment scenarios; and 7. monitoring indicators.
NIRB	229.	West Kitikmeot Resources Corp.	Traditional Activity and Knowledge	Vol. 9, s. 24.2 TLMRU baseline, pp. 24-17–24-79; Vol. 9, s. 25.2 food security baseline, pp. 25-14–25-29; Vol. 3, ss. 4–8; Vol. 6 caribou/wildlife/vegetation; Vol. 8 marine mammals.	The IS contains extensive TLMRU and food security baseline information informed by Inuit, Indigenous, and Community Knowledge. However, some spatial information is constrained by confidentiality, and the traceability of specific knowledge inputs to project design, mitigation, monitoring, and final conclusions is not fully transparent.	The IS does not provide a complete non-confidential knowledge-integration matrix showing how specific traditional activity and knowledge information changed design, baseline interpretation, effects analysis, mitigation, monitoring, or significance.	Provide a Traditional Activity and Knowledge integration matrix that identifies: 1. key knowledge/input theme; 2. source type and validation method, respecting confidentiality; 3. affected activity/resource/place; 4. IS section using the information; 5. design, mitigation, monitoring, or conclusion influenced; 6. unresolved concerns or differing views; and 7. follow-up commitments.

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NIRB	230.	West Kitikmeot Resources Corp.	Traditional Activity and Knowledge	Vol. 9, ss. 24.3–24.5, pp. 24-80–24-177; Vol. 9, ss. 25.3–25.5, pp. 25-30–25-67; Vol. 6, s. 16 caribou; Vol. 8, ss. 22–23; Vol. 11 Road Management Plan and WMMP.	The IS assesses TLMRU and food security effects and links to wildlife, marine, freshwater, and access-related pathways. However, the adequacy of conclusions depends heavily on future access controls, road governance, caribou measures, and monitoring that are not fully specified.	The access governance and monitoring framework does not fully demonstrate how harvesting access, caribou movement, cultural travel, food security, and rights-related effects will be managed, measured, and adaptively controlled over the Project life.	Provide a TLMRU access and harvesting effects addendum including: 1. road, port, marine, airstrip, and quarry access rules; 2. HTO/KIA/WKR decision roles; 3. harvest access approval/denial procedures; 4. caribou and marine-mammal-related access triggers; 5. monitoring indicators for harvest success, access avoidance, travel safety, and perceived contamination; 6. future-generation considerations; and 7. adaptive management responses.
NIRB	231.	West Kitikmeot Resources Corp.	Traditional Activity and Knowledge	Vol. 1 disclaimer on translated content; Vol. 3 engagement methods and language/translation; Vol. 9 TLMRU/food security/community health sections; Vol. 11 SEMP and management-plan engagement commitments.	The IS includes translated summaries/materials and describes engagement, but also identifies interim machine-translated content pending human validation. Language access is essential for meaningful review of socio-economic and cultural effects.	The IS does not provide a consolidated Official Languages compliance table for all public-facing socio-economic materials, including final human-verified translations, interpreter support, terminology validation, and notification of changes.	Provide an Official Languages and public-accessibility table identifying: 1. all socio-economic materials requiring translation; 2. languages provided; 3. human translator/reviewer qualifications; 4. community validation steps; 5. interpretation availability; 6. technical terminology review; 7. schedule for replacing interim translations; and 8. process to notify communities and NIRB of substantive translation changes.
NIRB	232.	West Kitikmeot Resources Corp.	Non-traditional Land Use and Resource Use	Vol. 9, s. 29.2 baseline, pp. 29-14–29-30; Vol. 9, ss. 29.3–29.5; Vol. 2 project components and shipping/road activities.	The IS provides a non-traditional land, marine, and resource use assessment including mining, commercial harvesting, tourism, recreation, land use designation, and marine navigation. However, overlap mapping and visual/aesthetic effects are less clearly consolidated for reviewers.	The IS does not provide a single map series showing all non-traditional land and marine uses, tourism/recreation areas, shipping routes, protected/important areas, visual receptors, and direct overlap with project components and restricted-access areas.	Provide a non-traditional use map package showing: 1. mining claims/exploration areas; 2. tourism/recreation/commercial harvesting areas; 3. protected/important areas; 4. marine navigation and small craft routes; 5. visual/aesthetic receptors; 6. project components and access restrictions; and 7. areas of overlap/conflict by phase.
NIRB	233.	West Kitikmeot Resources Corp.	Non-traditional Land Use and Resource Use	Vol. 9, ss. 29.3–29.5, pp. 29-31–29-67; Vol. 9 Volume Summary; Vol. 2 future development; Vol. 10 cumulative/transboundary assessments.	The IS predicts positive effects for access to mining and resources, and limited adverse effects for tourism, recreation, commercial harvesting, and marine navigation. Positive effects are not characterized in the same detail as adverse effects, and tourism wilderness-experience effects are not supported by a detailed receptor-based assessment.	The magnitude, distribution, and certainty of positive non-traditional-use effects are not fully characterized, and effects on tourism wilderness values and visual/aesthetic experience lack a clear monitoring/enhancement framework.	Provide a non-traditional use effects addendum including: 1. residual-effects characterization for positive and adverse effects; 2. tourism/recreation receptor assessment; 3. visual/aesthetic impact analysis; 4. access conflict analysis; 5. shipping and marine-navigation conflict assessment; 6. cumulative effects with future mining and shipping; and 7. monitoring/enhancement measures.

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NIRB	234.	West Kitikmeot Resources Corp.	Heritage Resources	Vol. 9, ss. 30.2.1–30.2.2, pp. 30-9–30-12; Vol. 11, Appendix 37G Heritage Resources Management Plan (Draft); Vol. 3 knowledge/engagement.	The IS identifies heritage resources as a VC and provides a baseline overview. However, the document indicates limitations regarding access to some archaeological data and reports, and paleontological resources require further attention.	Baseline information is incomplete for full technical review because not all archaeological datasets and reports are available, and paleontological potential is not clearly assessed for all project disturbance areas.	Provide a heritage baseline data-gap addendum including: 1. all AIA reports and data received/outstanding; 2. known sites by disturbance area, respecting confidentiality; 3. paleontological potential assessment; 4. Inuit Knowledge inputs on camps, travel routes, graves, sacred/spiritual areas, and historic places; 5. survey coverage; 6. outstanding fieldwork; and 7. data-sharing constraints and review process with GN and Inuit Heritage Trust.
NIRB	235.	West Kitikmeot Resources Corp.	Health and Wellbeing	Vol. 9, s. 26.2 baseline, pp. 26-17–26-36; Vol. 9, s. 25.2 food security baseline; Vol. 9, s. 27.2 economy/employment baseline; Vol. 3 engagement.	The IS provides community health and well-being baseline information and recognizes social determinants of health. However, some sensitive topics and household-level indicators are necessarily difficult to characterize, and the baseline does not fully show community-specific thresholds or the way indicators were selected with communities.	The IS lacks a consolidated community health and well-being indicator framework that identifies community-selected indicators, baseline status, vulnerable groups, thresholds, data limitations, and monitoring methods.	Provide a community health and well-being baseline/indicator framework including: 1. community-selected indicators; 2. baseline data by community; 3. household/family structure indicators where available; 4. mental health and coping indicators; 5. vulnerable groups; 6. nutrition and country food indicators; 7. work-life balance indicators; 8. limitations/confidentiality; and 9. monitoring thresholds.
NIRB	236.	West Kitikmeot Resources Corp.	Health and Wellbeing	Vol. 9, ss. 26.3–26.5, pp. 26-37–26-106; Vol. 9, s. 25 food security; Vol. 9, s. 27 employment/economy; Vol. 11 SEMP (Draft) and Inuit HR/Business Development Plan.	The IS assesses multiple health and well-being pathways and identifies both positive and adverse effects. It acknowledges rotational work stress, substance use, communicable disease risk, family dynamics, safety, and exposure to pollutants/hazards. However, the monitoring and mitigation mechanisms are not yet sufficiently specific to demonstrate effectiveness.	The SEMP and related plans do not yet define measurable health/well-being thresholds, action levels, reporting protocols, confidentiality safeguards, or partner responsibilities for sensitive social-health indicators.	Provide a health and well-being mitigation and monitoring plan that includes: 1. indicators for mental health, substance use, communicable disease, family/community cohesion, safety, racism/harassment, financial stress, and work-life balance; 2. baseline and thresholds; 3. partner roles; 4. confidential reporting safeguards; 5. worker/community programs; 6. adaptive responses; 7. annual reporting; and 8. procedures if adverse trends are detected.
NIRB	237.	West Kitikmeot Resources Corp.	Health and Wellbeing	Vol. 9, s. 26.5–26.7, pp. 26-104–26-107; Vol. 10, s. 33 transboundary effects; Vol. 3 engagement; Vol. 11, Appendix 37K SEMP (Draft).	The IS identifies follow-up and monitoring generally but does not provide a complete indicator set clearly developed with Inuit and other potentially affected Indigenous groups, including transboundary communities, for residual well-being effects.	The relationship between engagement feedback, selected indicators, residual-effect conclusions, and monitoring thresholds is not fully traceable.	Provide a well-being indicator development record showing: 1. engagement participants/groups; 2. indicators proposed by Inuit, Indigenous groups, and communities; 3. indicators selected/not selected and rationale; 4. baseline data; 5. thresholds/action levels; 6. transboundary community considerations; 7. reporting frequency; and 8. adaptive management commitments.

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NIRB	238.	West Kitikmeot Resources Corp.	Community Infrastructure and Public Services	Vol. 9, s. 28.2 baseline, pp. 28-12–28-34; Vol. 9, s. 26 health services; Vol. 3 engagement.	The IS provides infrastructure and services baseline information, including housing, services, utilities, transportation, and community context. However, capacity constraints and cost responsibilities are not fully quantified across all affected communities and regional service centres.	The baseline does not provide a complete capacity-and-cost table for health care, medevac, emergency response, housing, accommodations, utilities, communications, waste, transportation, and outpost facilities.	Provide an infrastructure baseline capacity table by community/service centre identifying: 1. existing capacity; 2. current constraints; 3. service providers; 4. projected project interaction; 5. spare capacity; 6. cost responsibility; 7. data gaps; and 8. seasonal or emergency-response limitations.
NIRB	239.	West Kitikmeot Resources Corp.	Community Infrastructure and Public Services	Vol. 9, ss. 28.3–28.5, pp. 28-35–28-85; Vol. 9, s. 26.3 health services; Vol. 10 transboundary effects; Vol. 11 SEMP.	The IS assesses infrastructure and service effects and identifies potential pressure on services, housing, accommodations, transportation, and health systems. However, the assessment does not fully quantify incremental demand, public costs, service agreements, NWT/Yellowknife service dependencies, medevac capacity, or closure access scenarios.	Service-capacity effects are described but not fully supported by quantitative demand estimates, agreements with service providers, incremental cost analysis, or binding mitigation commitments.	Provide an infrastructure and services effects addendum including: 1. projected demand on health, emergency, medevac, housing, accommodations, utilities, waste, communications, and transport services; 2. Nunavut/NWT/Yellowknife service dependencies; 3. incremental public/private costs; 4. agreements or coordination measures; 5. freight/return shipping feasibility; 6. community access upon closure or long-term stewardship; and 7. monitoring thresholds and mitigation actions.
NIRB	240.	West Kitikmeot Resources Corp.	Human Health and Safety	Vol. 9, s. 26.2 baseline health; Vol. 9, s. 25 country foods; Vol. 5 air quality; Vols. 7–8 water/sediment/fish; Vol. 10 HHERA references.	Human health baseline information is presented primarily through community health, food security, and environmental VC sections. However, contaminant exposure baseline information is not presented as an integrated human health exposure baseline across air, dust, water, soil/sediment, fish, marine mammals, birds, vegetation, and country foods.	A consolidated current-exposure baseline for contaminants of potential concern and receptor groups is not clearly provided for technical review of health risk pathways.	Provide a human health exposure baseline addendum that identifies: 1. current contaminant conditions by medium; 2. country food exposure pathways; 3. receptor groups and sensitive sub-populations; 4. comparison to Nunavut/Canada health statistics where appropriate; 5. exposure assumptions; 6. data gaps; and 7. implications for HHRA/monitoring.

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NIRB	241.	West Kitikmeot Resources Corp.	Human Health and Safety	Vol. 9, ss. 26.3.8 and 26.5–26.7; Vol. 5 air quality/noise/climate; Vol. 10 accidents and malfunctions; Vol. 11 Risk Management and Emergency Response Plan, Spill Contingency Plan, Explosives Management Plan, Noise and Vibration Abatement Plan.	The IS addresses worker/public safety through community health, air quality, noise, accidents/malfunctions, and management plans. However, several relevant management plans remain draft and the combined human-health pathway from dust, NO2, noise, potable water, extreme weather, accidents, and workplace cultural/language risks is not consolidated.	No single human health and safety risk register integrates worker and public receptors, conventional hazards, environmental exposure pathways, sensitive sub-populations, applicable standards, mitigation, thresholds, and emergency response responsibilities.	Provide a Human Health and Safety Risk Register covering: 1. worker and public receptor groups; 2. hazards by phase/location; 3. applicable standards/guidelines; 4. exposure pathway; 5. sensitive sub-populations; 6. mitigation and PPE/engineering controls; 7. monitoring thresholds; 8. emergency response; 9. cultural/language conflict prevention; and 10. residual risk and reporting.
NIRB	242.	West Kitikmeot Resources Corp.	Human Health and Safety	Vol. 9, ss. 26.2, 26.3.3, 28.2, 28.3.3; Vol. 11 SEMP and emergency response plans.	The IS discusses health infrastructure and services and potential changes in access to health infrastructure and services. However, the capacity to monitor and respond to increased health hazards is not fully demonstrated through confirmed roles, service agreements, medevac capacity, and health hazard reporting protocols.	Health-service quality and hazard-response capacity are not supported by a complete capacity assessment and implementation commitments with service providers.	Provide a health-service capacity and response plan including: 1. current service capacity; 2. expected Project demand; 3. medevac and emergency response pathways; 4. monitoring of increased health hazards; 5. responsibilities of WKR and public agencies; 6. agreements/communication protocols; 7. response thresholds; and 8. reporting to communities and regulators.
NIRB	243.	West Kitikmeot Resources Corp.	Human Health and Environmental Risk Assessment	Vol. 9, Appendix 26A Human Health and Ecological Risk Assessment, ss. 2, 4.1.1–4.1.4, 8, 9, 10; Vol. 9, s. 26.3.8; Vol. 1 Appendix A, pp. A-184–A-185.	Appendix 26A provides a project-specific HHRA framework and considers air, water, soil, country foods, noise, human receptors, exposure pathways, and risk communication. However, the level-of-detail rationale is not presented as a clear decision record showing how each Guideline factor influenced the scope, exclusions, receptor selection, or depth of quantitative analysis.	The IS does not provide a transparent scoping matrix that links each Guideline factor to the final HHRA/ERA scope, including why some pathways such as soil, water, country foods, and ecological receptors were screened out or not advanced to detailed quantitative risk characterization.	Provide a HHRA scoping matrix that identifies: 1. each Guideline level-of-detail factor; 2. the Project sources and pathways considered; 3. receptor groups and locations considered; 4. engagement or Inuit/Indigenous/community concerns considered; 5. whether the pathway was carried forward, screened out, or qualitatively assessed; 6. the rationale and evidence for each screening decision; and 7. implications for risk communication, monitoring, and mitigation.

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NIRB	244.	West Kitikmeot Resources Corp.	Human Health and Environmental Risk Assessment	Vol. 9, Appendix 26A, s. 4.0 Problem Formulation, s. 4.1.2 Identification of Chemicals of Potential Concern and Hazards, Table 4.1 Project Emission Inventory Summary; Vol. 5, Air Quality; Vol. 8, Marine Water and Sediment; Vol. 11 Water Management Plan and Waste Management Plan.	Appendix 26A identifies emissions and air/noise hazards and provides a worst-case emissions inventory. However, source terms for effluents, discharges, spills, wastewater, desalination brine, incineration residuals, waste streams, and land/water pathways are not consolidated in the HHRA in a way that allows reviewers to verify that all hazardous-substance sources have been considered.	There is no single source-term table for all HHRA-relevant emissions and effluents by phase, location, quantity/rate, release point, pathway, contaminant, receptor, and management plan. Some relevant information is dispersed across Volumes 5, 8, 10 and 11.	Provide a consolidated HHRA/ERA source-term table identifying: 1. source/activity; 2. project phase; 3. hazardous substances/COPCs; 4. predicted quantity, rate, concentration, and duration; 5. release point/location; 6. affected media; 7. receptor groups; 8. related model or monitoring dataset; 9. mitigation/control measure; and 10. whether the source was quantitatively assessed, qualitatively assessed, or screened out.
NIRB	245.	West Kitikmeot Resources Corp.	Human Health and Environmental Risk Assessment	Vol. 9, Appendix 26A, s. 4.1.2 Identification of Chemicals of Potential Concern and Hazards; Table 4.2 COPC Screening of Air Pollutants; s. 4.1.2.4 Soil Quality; s. 4.1.2.5 Traditional Country Foods.	The HHRA describes a COPC screening process and identifies NO ₂ , PM _{2.5} , and noise as primary health hazards. It also screens out some pathways, including soil and traditional country foods, based on a conclusion that Project activities are not expected to introduce relevant contaminants into these media.	The screening rationale for excluded pathways is not supported by a consolidated comparison of all relevant sources, including dust deposition, road aggregate/geochemistry, metals, fuel/vehicle residues, wastewater/brine, spills, sediment resuspension, fish tissue, and country food pathways. This is important because public concern includes real or perceived effects to country foods and land/water use.	Provide an expanded COPC screening addendum that includes: 1. all candidate COPCs by medium and source; 2. screening criteria and benchmarks; 3. data/model inputs used; 4. treatment of accidental releases and cumulative deposition; 5. rationale for excluding soil, water, fish, vegetation, terrestrial wildlife, marine mammals, and country foods; 6. uncertainty ratings; and 7. monitoring or communication commitments for excluded but community-concern pathways.
NIRB	246.	West Kitikmeot Resources Corp.	Human Health and Environmental Risk Assessment	Vol. 9, Appendix 26A, s. 4.1.1 Human Receptors and Locations; s. 4.1.3 Identification of Exposure Pathways; s. 4.1.4 Conceptual Site Model; Table 3.1 Hamlet and Seasonal-Use Sites; Vol. 9, ss. 24–26.	The HHRA identifies workers, communities, seasonal-use locations, and exposure pathways. However, the receptor characterization is not fully integrated with TLMRU, harvesting areas, camps, small craft use, marine mammal harvest areas, and culturally important places identified elsewhere in Volume 9 and Volume 3.	The IS does not provide a complete receptor map and receptor inventory linking community locations, seasonal residences/camps, harvesting areas, travel routes, water-use areas, country food use, worker accommodations, and sensitive sub-populations to distances from project sources and modelled exposure zones.	Provide a receptor inventory and map series showing: 1. communities, worker accommodations, seasonal-use sites, cabins/camps, travel corridors, harvesting areas, water-use locations, and marine-use areas; 2. distance to relevant Project sources; 3. exposure pathways by receptor group; 4. sensitive sub-populations considered; 5. modelled air/noise/water/spill influence areas; and 6. any confidentiality protections applied to culturally sensitive locations.

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NIRB	247.	West Kitikmeot Resources Corp.	Human Health and Environmental Risk Assessment	Vol. 9, Appendix 26A, s. 6 Exposure Assessment; s. 7 Risk Characterization; ss. 9.3–9.5 uncertainty; Vol. 5 air and noise modelling inputs.	Appendix 26A provides exposure and risk characterization for air pollutants and noise. The assessment is narrower for other media because some pathways were screened out or not advanced to quantitative dose assessment.	The IS does not provide dose/intake calculations for all pathways that are relevant to community concern or potential Project releases, particularly drinking/recreational water, soil/dust ingestion, country foods, and multi-pathway exposure. The uncertainty associated with relying mainly on modelled air/noise data is not fully translated into monitoring or adaptive management commitments.	Provide an exposure-method addendum that identifies: 1. all receptor-specific exposure equations and assumptions; 2. exposure frequency, duration, intake rates, and body weights; 3. country food ingestion assumptions or rationale for exclusion; 4. treatment of combined air, water, soil, dust, noise, and food pathways; 5. sensitivity analysis for seasonal land users and high-end receptors; and 6. monitoring triggers that would require recalculation of risk.
NIRB	248.	West Kitikmeot Resources Corp.	Human Health and Environmental Risk Assessment	Vol. 1 Appendix A, p. A-185–A-186; Vol. 9, Appendix 26A, s. 5 Toxicity Assessment and s. 10 Conclusion.	The concordance table states that health criteria are described in Appendix 26A but also notes that the technical data report does not define what is significant or not. This leaves a gap between risk benchmarks and the Impact Statement’s significance determination framework.	The IS does not clearly translate health risk benchmarks, hazard quotients, cancer/non-cancer risk metrics, noise annoyance/sleep disturbance criteria, and uncertainty into significance conclusions for NIRB purposes.	Provide a health-significance criteria addendum that explains: 1. risk metrics used for each pathway; 2. acceptable risk benchmarks; 3. how exceedances or margins of safety are interpreted; 4. how uncertainty and sensitive populations affect significance; 5. how risk results align with the Volume 4 significance framework; and 6. whether revised residual-effect conclusions are required for community health and well-being.
NIRB	249.	West Kitikmeot Resources Corp.	Human Health and Environmental Risk Assessment	Vol. 9, Appendix 26A, ss. 4.2.1–4.2.3 Ecological Health; Vol. 1 Appendix A, p. A-186; Vols. 5–8 effects assessments for air, freshwater, marine, vegetation and wildlife.	Appendix 26A identifies ecological receptors and pathways at the problem-formulation stage, but the concordance table notes that no hazardous substances or contaminants were identified for ecological receptors and therefore the assessment stops at problem formulation without progressing to detailed assessment methods.	The ERA does not provide a quantitative or semi-quantitative evaluation of ecological exposure/dose, toxicity reference values, ecological benchmarks, risk quotients, or monitoring thresholds for pathways such as dust deposition, water quality, sediment quality, soil, fish, vegetation, wildlife, and marine biota.	Provide an ERA addendum or a clear technical rationale demonstrating why detailed ERA was not required. If pathways are retained, provide: 1. ecological source-term and COPC table; 2. receptor-pathway model; 3. exposure assumptions; 4. ecological benchmarks/toxicity reference values; 5. risk characterization; 6. uncertainty analysis; and 7. links to monitoring thresholds in the AEMP, WMMP, air quality plan, water management plan, and spill response plans.

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NIRB	250.	West Kitikmeot Resources Corp.	Human Health and Environmental Risk Assessment	Vol. 9, s. 26.3.8.2 Mitigation, Management and Enhancement Measures; Vol. 9, Appendix 26A, s. 8 Risk Communication; Vol. 11 AEMP, Air Quality Monitoring and Management Plan, Water Management Plan, Waste Management Plan, Spill Contingency Plan, Risk Management and Emergency Response Plan.	The IS identifies mitigation and management measures relevant to health and environmental risk, including air quality, dust, water, spill, waste, and emergency response measures. However, several implementing plans are draft or contain NTD/TBD material, and risk communication is not fully linked to action thresholds.	There is no consolidated HHERA risk-management table tying each risk conclusion to prevention controls, monitoring parameter, action level, responsible plan, communication requirement, and adaptive-management response.	Provide a HHERA mitigation and risk-communication register identifying: 1. risk or pathway; 2. prevention/mitigation measure; 3. monitoring parameter; 4. threshold/action level; 5. responsible plan and position; 6. reporting schedule; 7. communication protocol for communities and land users; and 8. adaptive actions if monitoring indicates greater-than-predicted risk.
NIRB	251.	West Kitikmeot Resources Corp.	Accidents and Malfunctions Assessment	Vol. 10, s. 34 Accidents and Malfunctions, ss. 34.1–34.4; Vol. 1, MD.10.4; Vol. 11 Risk Management and Emergency Response Plan, Spill Contingency Plan, Port Management Plan.	Volume 10 assesses seven accident and malfunction scenarios, including terrestrial/aquatic hazardous material spill, marine hazardous materials spill, fire/explosion, explosives, vehicle/mobile equipment accident, aircraft accident, and marine vessel accident. However, the scope excludes third-party accidents and future third-party components even though the Project is designed to enable third-party port, road, fuel, and logistics use.	The assessment does not fully evaluate accidents and malfunctions associated with reasonably foreseeable third-party users, future-ready infrastructure, care and maintenance, reduced operations, closure/abandonment, or infrastructure transfer scenarios.	Provide an expanded accident/malfunction scope table that includes: 1. Project-only scenarios; 2. third-party user scenarios; 3. future-ready infrastructure and induced-use scenarios; 4. care and maintenance/reduced-operation scenarios; 5. closure, abandonment, or transfer scenarios; 6. rationale for inclusion or exclusion; and 7. implications for residual effects and emergency response capacity.
NIRB	252.	West Kitikmeot Resources Corp.	Accidents and Malfunctions Assessment	Vol. 10, s. 34.3.2 Risk Analysis Framework; Tables 34.2 and 34.3 likelihood and consequence ratings; Vol. 10, s. 34.4 Description of Potential Accidents or Malfunctions.	The assessment uses a semi-quantitative likelihood/consequence framework with generic likelihood and consequence definitions. The matrix provides a structured approach, but the basis for selecting scenarios and assigning scenario-specific likelihood ratings is not fully traceable.	The IS does not provide scenario-selection documentation showing failure modes, historical incident data, Arctic precedent, design assumptions, human factors, traffic/vessel/aircraft frequency, equipment failure assumptions, or uncertainty around likelihood ratings.	Provide a hazard identification and likelihood basis appendix that includes: 1. method used to identify scenarios; 2. failure modes and causes; 3. data sources and analogues; 4. assumptions for vessel, aircraft, road, fuel, explosive, and hazardous-material activity levels; 5. scenario-specific likelihood ratings before and after mitigation; 6. uncertainty/confidence ratings; and 7. sensitivity testing for increased traffic or third-party use.

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NIRB	253.	West Kitikmeot Resources Corp.	Accidents and Malfunctions Assessment	Vol. 10, ss. 34.4, 34.5, 34.6.3, 34.7.1–34.7.7; Vol. 10, marine hazardous materials spill discussion, p. 34-28; Vol. 11 Spill Contingency Plan and RMERP drafts.	Volume 10 describes major release scenarios and recognizes seasonal differences, including open-water marine spills, spills to ice, first-year construction risk, fuel transfer, vessel incidents, leaks near the ocean, and loss of materials during onloading/offloading.	The assessment does not provide a complete source-term table for each scenario with maximum credible and plausible worst-case quantities, material properties, release rates, spill trajectories, seasonal containment assumptions, sensitive receptor proximity, and expected response times.	Provide a scenario source-term table identifying: 1. contaminant/material type; 2. maximum credible quantity; 3. plausible worst-case quantity; 4. mechanism and rate of release; 5. physical/chemical form and behaviour; 6. release location; 7. season/ice condition; 8. likely transport pathway; 9. sensitive receptors; 10. available response equipment; and 11. response-time assumptions.
NIRB	254.	West Kitikmeot Resources Corp.	Accidents and Malfunctions Assessment	Vol. 10, ss. 34.5–34.7; Vol. 10, s. 34.6.3 Seasonal Risk Considerations; Vol. 1 MD.10.4; Vols. 6–9 VC assessments.	Volume 10 discusses effects pathways, seasonal risk, and residual effects for VCs. It also recognizes that effects may be significant for individual traditional land users if an incident causes avoidance of an area or resource due to actual or perceived effects.	The IS does not clearly distinguish unmitigated versus mitigated consequences, does not provide detailed plausible worst-case consequence modelling for each major incident type, and does not present a sensitive-timing overlay for wildlife, fish, TLMRU, food security, community health, and cultural areas.	Provide a worst-case and unmitigated-effects addendum that includes: 1. plausible worst-case scenario for each major incident type; 2. unmitigated environmental, health, social, economic, cultural, and rights-related consequences; 3. mitigated residual consequences; 4. sensitive receptors and timing windows; 5. maps of spill/fire/explosion/accident influence areas; 6. significance rationale for individual and community-level effects; and 7. uncertainty/confidence ratings.
NIRB	255.	West Kitikmeot Resources Corp.	Accidents and Malfunctions Assessment	Vol. 10, ss. 34.6.1–34.6.2; Vol. 11 RMERP draft, SCP draft, EPP, Fuel Management Plan, Hazardous Materials Management Plan, Port Management Plan; RMERP sections for spills on water, marine spills, extreme weather, evacuation, communication and incident management contain NTD material.	The IS lists management plans that will reduce risk and mitigate consequences. However, key response plans remain draft, and the RMERP includes NTD sections for spills on water, marine spills, security incidents, extreme weather, evacuation/medical response, emergency communication, and incident reporting.	Because the residual effects assessment relies on these plans, the absence of final procedures, resources, seasonal response methods, clean-up/restoration criteria, and marine SOPEP interface limits technical review of mitigation effectiveness.	Provide updated RMERP, SCP, Port Management Plan, Fuel Management Plan, and Hazardous Materials Management Plan sections sufficient for technical review, including: 1. scenario-specific response procedures; 2. design safeguards; 3. equipment inventory and locations; 4. spill/fire/explosion/medical/evacuation procedures; 5. shoreline, freshwater, marine, ice and snow response methods; 6. clean-up/restoration criteria; 7. waste handling after incidents; and 8. links to adaptive management and follow-up monitoring.

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NIRB	256.	West Kitikmeot Resources Corp.	Accidents and Malfunctions Assessment	Vol. 10, s. 34.6.2 Emergency Preparedness and Response; Vol. 11 RMERP draft, Section 5 Emergency Communication Protocol; Vol. 9, infrastructure and services assessment.	The IS recognizes the need for emergency preparedness and identifies that Project infrastructure may enhance regional response capacity. However, the RMERP emergency communication and coordination sections remain draft/NTD and do not yet demonstrate actual arrangements with response organizations, communities, or government agencies.	The IS does not provide confirmed external response capacity, response-time estimates, mutual-aid arrangements, community notification roles, regional evacuation/medical coordination, or evidence that local and territorial capacities can support remote Arctic incidents.	Provide an emergency coordination addendum that includes: 1. named internal and external response organizations; 2. roles and responsibilities; 3. signed or draft coordination agreements; 4. response-time estimates by season; 5. medical evacuation and sheltering arrangements; 6. community/government contact protocols; 7. equipment and personnel availability; 8. gaps in regional capacity; and 9. mitigation commitments to close capacity gaps before construction.
NIRB	257.	West Kitikmeot Resources Corp.	Accidents and Malfunctions Assessment	Vol. 10, s. 34.6.2; Vol. 11 Spill Contingency Plan draft, s. 5 Training; Vol. 11 RMERP draft; Vol. 9, marine navigation mitigation requiring spill response equipment and training.	The IS refers to spill response equipment and training and the draft SCP includes a training section. However, the content is not sufficiently developed to confirm who will be trained, to what standard, how often, for which scenarios, and how competency will be verified.	No complete training matrix is provided for spill response, marine spill/SOPEP interface, fire/explosion, aircraft incident, vehicle accident, explosives incident, medical evacuation, wildlife/heritage protection during response, communications, and incident command.	Provide an emergency response training matrix identifying: 1. trainee groups; 2. required training by scenario; 3. standards/certifications; 4. frequency and refresher schedule; 5. simulation/tabletop/live exercise requirements; 6. competency verification; 7. contractor and third-party user requirements; 8. community or Inuit monitor involvement; and 9. records and reporting to regulators.
NIRB	258.	West Kitikmeot Resources Corp.	Accidents and Malfunctions Assessment	Vol. 11 RMERP draft, Section 5 Emergency Communication Protocol; Vol. 10, s. 34; Vol. 1 MD.10.4.	The RMERP includes an Emergency Communication Protocol section, but it remains NTD and indicates that protocols still need to be built out. This is a core requirement because accidents may affect land users, marine users, country food confidence, neighbouring jurisdictions, and emergency service providers.	The IS does not provide a complete emergency communication protocol, including notification triggers, timelines, languages, contact lists, message templates, community/HTO/KIA/regulator responsibilities, public updates, and follow-up reporting.	Provide a complete emergency communication protocol that includes: 1. notification triggers by incident type and severity; 2. regulator, KIA, HTO, community, neighbouring jurisdiction and emergency-service contact lists; 3. timelines for initial and follow-up notifications; 4. communication languages and formats; 5. public advisory templates for spills, air/noise events, country food concerns, access restrictions and marine safety; 6. roles and approval authority; and 7. incident close-out reporting procedures.

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NIRB	259.	West Kitikmeot Resources Corp.	Terrestrial Baseline – Permafrost, Taliks, and Stream Crossings	Volume 6, Section 14.2 Baseline Conditions; Appendix 14A, Section 4 Summary of Baseline Conditions; Volume 7, Section 19.3.4 Groundwater Quality.	generally discusses permafrost, talik occurrence, groundwater, and stream crossings; however, the relationship between these factors is not clearly summarized for major stream crossings. Additional clarity is needed to understand how permafrost, taliks, subsurface flow, and winter icing conditions were considered in the baseline characterization and how they may influence terrain stability and design assumptions.	1. It is unclear how permafrost, talik occurrence, subsurface flow, and winter icing conditions were assessed at major stream crossings. 2. The influence of these baseline conditions on terrain stability has not been clearly described. 3. It is unclear how these conditions informed stream-crossing design assumptions	clearer summary of how permafrost, talik occurrence, subsurface flow, and winter icing conditions were considered at major stream crossings, including how these baseline conditions informed the assessment of terrain stability and design assumptions.
NIRB	260.	West Kitikmeot Resources Corp.	Terrestrial Baseline – Topsoil and Overburden Suitability	Volume 6, Section 14.2.2.3 Surficial Materials and Landforms; Appendix 14A, Section 5.2 Soil Distribution; Volume 11, Borrow Pit and Quarry Management Plan.	reference describe soil distribution and surficial materials, but the suitability of salvaged topsoil, organics, and overburden for revegetation of disturbed areas is not clearly summarized. This information is relevant to understanding reclamation feasibility and the effectiveness of revegetation measures.	1. The suitability of salvaged topsoil, organics, and overburden for revegetation has not been demonstrated. 2. It is unclear how these materials will be salvaged, stored, handled, and reused to support reclamation. 3. The effectiveness of the proposed material-management approach for successful revegetation has not been assessed.	additional information on the suitability of salvaged topsoil, organics, and overburden for use in revegetation of surface-disturbed areas, including how these materials will be managed to support reclamation.

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NIRB	261.	West Kitikmeot Resources Corp.	Terrestrial Baseline – Permafrost Temperatures at Key Infrastructure Locations	Volume 6, Section 14.2 Baseline Conditions; Appendix 14A, Section 4.2 Permafrost; Volume 6, Section 14.3.4 Change in Terrain Stability.	discusses ground thermal regime, thaw sensitivity, and climate-related permafrost risks; however, site-specific permafrost temperature information for key infrastructure locations is not clearly presented. Additional detail is needed to understand how permafrost temperature conditions were incorporated into stability and safety considerations for Project infrastructure.	1. Site-specific permafrost temperature conditions at key infrastructure locations have not been provided. 2. The timing for collecting this information is unclear. 3. It is unclear how the data will inform final design and terrain stability assessments.	Please provide additional information on site-specific permafrost temperature conditions at key infrastructure locations, or clarify when this information will be collected and how it will be used in final design and terrain stability assessments.
NIRB	262.	West Kitikmeot Resources Corp.	Terrestrial Baseline – Paleontological and Palaeobotanical Resources	Volume 9, Section 30.2 Baseline Conditions; Volume 1 Main Document, Section MD.9.7.1.	indicates that paleontological resources have not been fully addressed and may require further consideration with regulators. It is not clear whether paleontological or palaeobotanical resources are known or expected within the Local Study Area, or how these resources will be assessed prior to ground disturbance.	1. It is unclear whether paleontological or palaeobotanical resources are known or expected within the Local Study Area. 2. The approach for identifying and assessing these resources before ground disturbance has not been described.	Please clarify whether any paleontological or palaeobotanical resources are known or expected within the Local Study Area, and describe how these resources will be assessed prior to ground disturbance.
NIRB	263.	West Kitikmeot Resources Corp.	Terrestrial Impact Assessment – Topography and Sensitive Landforms	Volume 6, Section 14.3.2 Change in Landforms and Terrain Conditions, p. 14-29.	discusses changes to topography, terrain conditions, landforms, and ground disturbance. The technical information is generally provided; however, the assessment is mostly qualitative and does not clearly summarize effects by major Project component, such as road, port, aerodrome, borrow areas, quarries, and Jericho Station.	1. Predicted effects on topography and sensitive landforms have not been clearly summarized by major Project component. 2. Potential effects from borrow areas, roads, port facilities, the aerodrome, and related infrastructure have not been separately identified.	Please provide a summary of predicted effects on topography and sensitive landforms by major Project component, including borrow resource extraction areas, roads, port facilities, aerodrome, and related infrastructure.

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NIRB	264.	West Kitikmeot Resources Corp.	Terrestrial Impact Assessment – Unique and Valuable Landforms	Volume 6, Section 14.3.2 Change in Landforms and Terrain Conditions, p. 14-29.	discusses unique landforms such as eskers and wetlands and notes that effects are expected to be limited. However, the impact assessment does not clearly show the predicted loss or alteration of each unique/valuable landform type in a simple summary.	1. The predicted area or extent of effects on eskers, wetlands, and fragile landscapes has not been clearly identified. 2. It is unclear how effects on unique or valuable landforms informed mitigation measures and residual effects conclusions.	Please provide a summary table identifying the predicted area or extent of impact to unique or valuable landforms, including eskers, wetlands, and fragile landscapes, and explain how these effects were considered in mitigation and residual effects conclusions.
NIRB	265.	West Kitikmeot Resources Corp.	Terrestrial Impact Assessment – Soil Erosion and Stream Bank Stability	Volume 6, Section 14.3.3 Change in Soil Properties, p. 14-33; Section 14.3.4 Change in Terrain Stability, p. 14-34.	Soil erosion, sediment control, terrain stability, and runoff mitigation are discussed. However, the assessment does not clearly identify higher-risk erosion areas, stream bank erosion areas, road embankments, and water crossings by location or Project phase.	1. Areas with higher potential for soil erosion, stream bank erosion, road embankment instability, and erosion at water crossings have not been identified. 2. Site-specific mitigation measures for these higher-risk locations during construction and operations have not been described.	Please identify areas with higher potential for soil erosion, stream bank erosion, road embankment instability, and erosion at water crossings during construction and operations, and describe the specific mitigation measures that will be applied at these locations.
NIRB	266.	West Kitikmeot Resources Corp.	Terrestrial Impact Assessment – Sensitive Terrain, Taliks, and Project Design	Volume 6, Section 14.3.2, p. 14-29; Volume 6, Section 14.3.4, p. 14-34; Volume 7, Section 19.3.4 Groundwater Quality, p. 19-76.	discusses sensitive terrain, ice-rich permafrost, thaw-sensitive terrain, slopes, taliks, and waterbodies. However, it is not clear how these features were specifically incorporated into road alignment, water crossing design, borrow/quarry siting, and infrastructure planning.	1. It is unclear how sensitive landforms, ice-rich permafrost, thaw-sensitive slopes, and taliks near waterbodies were identified and assessed. 2. It has not been demonstrated how these conditions informed the planning and design of roads, water crossings, borrow and quarry areas, and other infrastructure.	Please explain how sensitive landforms, ice-rich permafrost, thaw-sensitive slopes, and taliks near waterbodies were incorporated into Project planning and design for roads, water crossings, borrow/quarry areas, and infrastructure.

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NIRB	267.	West Kitikmeot Resources Corp.	Terrestrial Impact Assessment – Physical and Thermal Stability of Permafrost Terrain	Volume 6, Section 14.3.4 Change in Terrain Stability, p. 14-34.	discusses permafrost thaw, ground settlement, slumping, and terrain instability. However, the assessment states that a potential failure model analysis was not completed and that additional geotechnical information will be collected before construction. This limits confidence in the technical basis for stability conclusions.	1. The approach for assessing physical and thermal stability risks before construction has not been clearly described. 2. Potential risks from ground settlement, loss of soil strength, slumping, and permafrost thaw have not been adequately evaluated. 3. It is unclear how these risks will be incorporated into final design, mitigation measures, and monitoring programs	Please provide additional detail on how physical and thermal stability risks, including ground settlement, loss of soil strength, slumping, and permafrost thaw, will be assessed before construction and incorporated into final design, mitigation, and monitoring.
NIRB	268.	West Kitikmeot Resources Corp.	Terrestrial Impact Assessment – Permafrost Prediction and Climate Change	Volume 6, Section 14.3.4, p. 14-34; Volume 10, Section 35.3 Effects of the Environment on the Project, p. 35-9.	recognizes climate change, permafrost thaw, snow accumulation, thaw settlement, subsidence, and infrastructure risk. Volume 10 also identifies risks such as differential settlement, structural failure, thermokarst development, and embankment instability. However, long-term, site-specific permafrost evolution predictions are not clearly provided for key infrastructure.	1. The predicted long-term behaviour of permafrost at key Project infrastructure has not been clearly described. 2. Potential changes in permafrost degradation rates, thermal regimes, and snow accumulation have not been adequately assessed. 3. Climate change effects on long-term permafrost stability have not been clearly incorporated into the predictions. 4. The timing for completing this information and how it will inform final design are unclear.	Please provide additional information on how long-term permafrost behaviour, including degradation rate, thermal regime changes, snow accumulation, and climate change effects, was predicted for key Project infrastructure, or clarify when this information will be completed and how it will inform final design.

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NIRB	269.	West Kitikmeot Resources Corp.	Terrestrial Impact Assessment – Country Food Contaminant Pathways and Consumption Assumptions	Volume 9, Appendix 26A Human Health and Ecological Risk Assessment, Sections 4.1.2 and 4.1.3; Volume 9, Section 24 Traditional Land, Marine, and Resource Use; Volume 9, Section 25 Food Security and Food Sovereignty.	Statement discusses traditional foods, harvesting, country food pathways, and potential contaminant exposure. The HHERA indicates that contamination of vegetation, fish, and terrestrial wildlife would require chemical pollutants in soil or water, and concludes that the Project is not expected to contaminate soil or waterbodies. However, the assessment does not clearly connect contaminant pathways across air, dust deposition, soil, water, vegetation, fish, wildlife, and country foods. It also does not clearly summarize which country foods may be consumed in the potentially affected area, which parts are consumed, consumption frequency, and whether potential contaminants may persist or bioaccumulate.	1. Potential contaminant pathways to country foods have not been clearly evaluated, including air, dust, soil, water, vegetation, fish, wildlife, and human consumption pathways. 2. The country foods consumed in the potentially affected area, including consumed parts and consumption frequency, have not been clearly identified. 3. The persistence and bioaccumulation potential of contaminants have not been adequately assessed. 4. It is unclear how contaminant exposure through country foods was incorporated into the effects assessment.	Please explain how potential contaminant pathways to country foods were evaluated, including air emissions, dust deposition, soil and water interactions, vegetation uptake, fish exposure, wildlife exposure, and human consumption. Please also identify the country foods expected to be consumed in the potentially affected area, including available information on consumed parts and consumption frequency, and explain whether potential contaminants may persist or bioaccumulate and how this was considered in the effects assessment.
NIRB	270.	West Kitikmeot Resources Corp.	Terrestrial Impact Assessment – Habitat Alteration from Pollutants and Noise	Volume 6, Section 16.4.2.2 Caribou, p. 16-92; Section 17.4.1.2 Birds, p. 17-35; Section 18.4.1.2 Muskox, p. 18-68; Section 18.8.1.2 Moose, p. 18-95; Section 18.12.1.2 Grizzly Bear, p. 18-123; Section 18.16.1.2 Wolverine, p. 18-152; Volume 8, Section 23.3.3 Marine Mammals, p. 23-69.	Wildlife habitat loss, indirect habitat loss, sensory disturbance, and behaviour are assessed across several sections. However, the technical linkage between pollutant-related vegetation changes, noise disturbance, wildlife habitat quality, calving/post-calving areas, and marine habitat is spread across multiple sections and not clearly integrated.	1. It is unclear how habitat loss or alteration from pollutants, dust, and noise was assessed for terrestrial wildlife. 2. Potential effects on caribou calving and post-calving areas, migratory birds, and other terrestrial wildlife have not been clearly summarized. 3. Connections between terrestrial effects and related marine habitats have not been adequately considered.	Please provide a summary explaining how habitat loss or alteration due to pollutants, dust, and noise was considered for terrestrial wildlife, including caribou calving/post-calving areas, migratory birds, other terrestrial wildlife, and related marine habitat connections.

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NIRB	271.	West Kitikmeot Resources Corp.	Terrestrial Impact Assessment – Environmental Receptivity to Harmful Substances	Volume 9, Appendix 26A HHERA, Sections 4.1 and 4.2.	HHERA discusses exposure pathways and receptors, but environmental receptivity is not clearly summarized for terrestrial conditions. The assessment would benefit from a clearer explanation of ecological, physical, and climatic factors that could affect exposure to harmful substances, such as permafrost, snow/ice, drainage, dust transport, vegetation uptake, and seasonality.	1. The ecological, physical, and climatic factors influencing exposure to harmful substances in the terrestrial environment have not been clearly summarized. 2. It is unclear how these factors were incorporated into the assessment of potential effects.	Please provide a clearer summary of the ecological, physical, and climatic factors that may influence exposure to harmful substances in the terrestrial environment and explain how these factors were considered in the assessment of potential effects.
NIRB	272.	West Kitikmeot Resources Corp.	Accidental spill scenarios and pathways to terrestrial wildlife and harvesting areas	Vol 10, Section 34 (Accidents and Malfunctions); Vol 6, Sections 16 and 18	Arising from KHTO-IR-007. The IS addresses contamination and bioaccumulation generally but does not identify credible spill scenarios or trace pathways from those scenarios to terrestrial wildlife, sensitive habitat and harvesting areas.	No spill-scenario set with environmental settings, nor pathway analysis to terrestrial wildlife, wetlands, calving areas, denning sites, or traditional harvesting zones.	Provide: (a) the credible accidental-spill scenarios for Project activities (fuel, hazardous materials, concentrate), including volume, location and environmental setting; (b) the pathways by which each scenario could reach terrestrial wildlife and habitat; (c) the predicted consequences for wildlife species, wetlands, calving and denning areas, and traditional harvesting zones; and (d) how these results were carried into the residual and cumulative effects conclusions.
NIRB	273.	West Kitikmeot Resources Corp.	Terrestrial Impact Assessment – Terrain Hazards and Snow Drifts	Volume 6, Section 14.3.4 Change in Terrain Stability, p. 14-34; Volume 10, Section 35.3 Effects of the Environment on the Project, p. 35-9.	Terrain stability hazards are discussed in detail, including permafrost thaw, slumping, settlement, terrain instability, drainage, and embankment effects. However, discussion of the occurrence, frequency, and distribution of snow drifts and snowbanks along the road and infrastructure is limited. Volume 10 notes snow clearing concerns and HTO suggestions related to snowblowers and windrows, but this is not fully connected to terrain hazard assessment or road management planning.	1. The occurrence, frequency, and distribution of terrain hazards, including ground instability, snow drifts, and snowbanks, have not been clearly identified. 2. It is unclear how these hazards were incorporated into road design, operation, and maintenance planning.	Please provide additional information on the potential occurrence, frequency, and distribution of terrain hazards, including ground instability, snow drifts, and snowbanks, and explain how these hazards were considered in road design, operation, and maintenance planning.

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NIRB	274.	West Kitikmeot Resources Corp.	Noise and Vibration Baseline – Monitoring Coverage and Seasonal Variability	Volume 5, Section 13.2 Baseline Conditions, p. 13-16; Appendix 13A Acoustic Baseline Report, Section 4 Methods; Appendix 13B Noise and Vibration Technical Modelling Report, Section 4 Baseline Conditions.	Baseline noise conditions are described using monitoring at two locations. The technical modelling report states that monitoring was completed at one remote location south of Jericho Station for 3 days in September 2017 and one Grays Bay Port location for 5 days in August 2024. It also explains that wind, rain, birds, tidal waves, vegetation rustling, insects, and occasional aircraft influenced the acoustic environment. However, the baseline program appears limited in spatial and seasonal coverage, and it is not clear how well it represents winter, spring, shoulder season, road corridor, quarry areas, and long-term baseline variability.	1. The representativeness of baseline noise monitoring locations across the Project area has not been demonstrated. 2. It is unclear whether the road corridor, port, Jericho Station, and quarry areas were adequately represented. 3. The representativeness of the monitoring periods across different seasons has not been demonstrated.	Please provide additional information explaining how the baseline noise monitoring locations and monitoring periods are representative of baseline conditions across the Project area, including the road corridor, port, Jericho Station, quarry areas, and different seasons.
NIRB	275.	West Kitikmeot Resources Corp.	Noise and Vibration Baseline – Baseline Vibration Conditions	Volume 5, Section 13.2 Baseline Conditions, p. 13-16; Appendix 13B, Section 4 Baseline Conditions.	The guideline asks for baseline noise and vibration levels. Provides baseline sound level monitoring and modelling assumptions, but baseline vibration conditions are not clearly described in the same level of detail. It is not clear whether existing vibration sources were measured, assumed to be negligible, or screened out.	1. Baseline vibration conditions for the Project area have not been clearly characterized. 2. It is unclear whether existing vibration sources were measured, assumed to be negligible, or otherwise considered in the assessment.	Please clarify how baseline vibration conditions were characterized for the Project area, including whether existing vibration sources were measured, assumed to be negligible, or otherwise considered in the assessment.

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NIRB	276.	West Kitikmeot Resources Corp.	Noise and Vibration Baseline – Weather Effects on Baseline Sound Levels	Volume 5, Section 13.2 Baseline Conditions, p. 13-16; Appendix 13B, Section 4 Baseline Conditions.	Recognizes that weather strongly affects baseline sound levels. The modelling report states that wind speeds reached up to 34 km/hr at SLM1 and 31 km/hr at SLM2, and that two baseline scenarios were used: one excluding wind speeds above 15 km/hr and one including all wind data because high wind is common in the area. This is technically useful, but the implications of using these two scenarios for predicted noise effects and receptor assessment are not clearly summarized.	1. It is unclear how weather-related variability, including high wind conditions, was considered in selecting baseline noise levels. 2. The influence of weather conditions on predicted Project noise effects at receptors has not been clearly assessed.	Please explain how weather-related baseline noise variability, including high wind conditions, was considered when selecting baseline sound levels and evaluating predicted Project noise effects at receptors.
NIRB	277.	West Kitikmeot Resources Corp.	Noise and Vibration – Wildlife Response Thresholds and Predicted Noise Effects	Volume 5, Section 13.2 Baseline Conditions; Volume 5, Section 13.3 Assessment of Project Effects on Noise and Vibration; Volume 6, Sections 16.4, 17.4, and 18.4/18.8/18.12/18.16; Volume 8, Sections 22.3.3, 22.3.4, 23.3.3, and 23.3.4.	Noise and vibration effects on wildlife, fish, and marine mammals are discussed across several VC sections. However, the technical link between predicted Project noise/vibration levels and species-specific behavioural responses is not clearly shown. The assessment would be clearer if it identified the literature, thresholds, response criteria, distances, timing, and sensitive life stages used to translate predicted noise levels into effects conclusions for wildlife and aquatic receptors.	1. The link between predicted noise and vibration levels and expected behavioural responses of key species has not been clearly demonstrated. 2. Species-specific thresholds, effect distances, timing, and sensitive life stages have not been clearly identified. 3. The supporting literature and evidence used to assess effects on terrestrial wildlife, fish, and marine mammals have not been adequately described.	Please clarify how predicted Project noise and vibration levels were linked to expected behavioural responses for key species, including caribou, migratory birds, Species at Risk, muskox, moose, grizzly bear, wolverine, freshwater fish, marine fish, and marine mammals. Please identify any species-specific thresholds, distances, timing, sensitive life stages, or supporting literature used.

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NIRB	278.	West Kitikmeot Resources Corp.	Noise and Vibration Baseline – Marine Underwater Sound Baseline	Volume 8, Section 23.3.3 Marine Mammals; Volume 8 acoustic baseline information.	Underwater sound baseline information is provided, including acoustic recording in Grays Bay. The marine acoustic study used one AMAR deployment for 30 days from July 24 to August 23, 2025, and notes that weather and flow noise were major influences. However, this appears to represent only a limited open-water period and does not clearly characterize underwater sound variability during shoulder seasons, under-ice conditions, or higher vessel activity scenarios.	1. The representativeness of the underwater acoustic baseline across open-water, shoulder-season, and under-ice conditions has not been demonstrated. 2. It is unclear how seasonal variation in marine sound conditions was incorporated into the marine noise assessment.	Please clarify how the underwater acoustic baseline is representative of marine sound conditions across relevant seasonal conditions, including open-water, shoulder season, and under-ice periods, and how this was considered in the marine noise assessment.
NIRB	279.	West Kitikmeot Resources Corp.	Noise and Vibration – Blasting and Underwater Noise Effects on Freshwater Fish	Volume 7, Section 20.3.3 Change in Fish Health, Growth, or Survival, including Section 20.3.3.2 Project Effects Pathways – Death of Fish – Production of Underwater Noise and Section 20.3.3.4 Project Residual Effects; Volume 11, Appendix 37E Noise and Vibration Abatement Plan.	Statement discusses underwater noise and vibration effects from embankment construction, drilling, and blasting near freshwater environments. It states that blasting will occur on land and not in fish-bearing waterbodies or watercourses, and that DFO guidance and modified blasting techniques will be considered. However, it is not clear how blasting setbacks, fish-bearing waters, stream crossings, and quarry locations will be verified at site-specific locations before blasting.	1. Site-specific management of blasting and underwater noise effects on freshwater fish and fish habitat has not been clearly described. 2. It is unclear how setback distances from fish-bearing waters will be verified at quarry, road, and water crossing locations. 3. Compliance with applicable DFO thresholds has not been demonstrated. 4. Mitigation and monitoring measures for blasting near freshwater environments have not been clearly identified.	Please explain how blasting and underwater noise effects on freshwater fish and fish habitat will be managed at site-specific quarry, road, and water crossing locations. Please describe how setback distances from fish-bearing waters will be verified, how applicable DFO thresholds will be met, and what mitigation or monitoring will be implemented if blasting occurs near freshwater environments.

IR Source	IR #	IR Directed To	Subject	IS Reference Reviewed	Reviewer Comments / Reasoning	Missing Information / Gap	Information Requests / IR
NIRB	280.	West Kitikmeot Resources Corp.	Noise and Vibration – Blasting Vibration Monitoring and Adaptive Management	Volume 5, Section 13.3 Assessment of Project Effects on Noise and Vibration; Volume 5, Section 13.3.3.4 Project Residual Effects; Volume 11, Appendix 37E Noise and Vibration Abatement Plan, Section 3 Monitoring Program.	Blasting and drilling effects are assessed, and blasting is identified as the primary vibration and air overpressure source requiring mitigation. The draft Noise and Vibration Abatement Plan states that vibration monitoring stations may be implemented if necessary and that monitoring locations will be selected based on proximity to blast sites, but specific monitoring locations and decision criteria have not yet been identified.	1. Site-specific management of noise and vibration from blasting, drilling, maintenance, and Project traffic has not been clearly described. 2. Criteria for determining when vibration monitoring is required have not been identified. 3. The process for selecting monitoring locations has not been explained. 4. It is unclear how monitoring results will be used to modify blasting practices when thresholds are approached or exceeded.	Please clarify how blasting, drilling, maintenance, and Project traffic noise/vibration will be managed at site-specific locations, including criteria for when vibration monitoring is required, how monitoring locations will be selected, and how monitoring results will be used to adjust blasting practices if thresholds are approached or exceeded.
NIRB	281.	West Kitikmeot Resources Corp.	Noise and Vibration Impact Assessment – Project Equipment and Activity Noise Levels	Volume 5, Section 13.3 Assessment of Project Effects on Noise and Vibration, p. 13-23; Appendix 13B Noise and Vibration Technical Modelling Report.	Predicted noise and vibration levels are provided, but a clearer summary linking each major Project activity to its predicted noise and vibration results would improve reviewability.	1. Predicted noise and vibration levels have not been clearly linked to each major Project activity and equipment group. 2. Activity-specific levels for road construction, quarry operations, blasting, drilling, aircraft, power generation, traffic, and port construction have not been clearly summarized.	Please provide a summary table linking each major Project activity and equipment group to the predicted noise and vibration levels, including road construction, quarry operations, blasting, drilling, aircraft operations, power generation, traffic, and port construction.

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NIRB	282.	West Kitikmeot Resources Corp.	Noise and Vibration Impact Assessment – Atmospheric Noise from Ground Transportation	Volume 5, Section 13.3.1 Project Interactions with Noise and Vibration, p. 13-23; Volume 5, Section 13.3.2.4 Project Residual Effects, p. 13-29.	Ground transportation noise is assessed, including Project traffic and road-related activities. The technical information is generally provided; however, traffic noise effects are not clearly summarized by Project phase, road segment, receptor distance, and expected traffic intensity.	1. Predicted ground transportation noise effects have not been clearly summarized by Project phase and road segment. 2. It is unclear how traffic volumes, receptor distances, and mitigation measures were incorporated into the assessment.	Please provide a summary of predicted atmospheric noise effects from ground transportation by Project phase and road segment, including how traffic volumes, receptor distances, and mitigation measures were considered.
NIRB	283.	West Kitikmeot Resources Corp.	Noise and Vibration Impact Assessment – Air Transportation Noise	Volume 5, Section 13.3.1 Project Interactions with Noise and Vibration, p. 13-23; Appendix 13B Noise and Vibration Technical Modelling Report.	Air transportation noise is included in the assessment. However, it is not clearly summarized how aircraft activity, including flight frequency, aircraft type, timing, and low-level flight assumptions, were incorporated into the predicted noise effects and wildlife disturbance assessment.	1. The assessment of air transportation noise has not been clearly described. 2. Aircraft type, flight frequency, timing, flight paths, and altitudes have not been clearly identified. 3. It is unclear how these assumptions were considered in assessing effects on human receptors and wildlife.	Please clarify how air transportation noise was assessed, including aircraft type, frequency, timing, flight paths or altitudes, and how these assumptions were considered for human receptors and wildlife disturbance.
NIRB	284.	West Kitikmeot Resources Corp.	Noise and Vibration Impact Assessment – Construction Equipment and Power Generators	Volume 5, Section 13.3.1 Project Interactions with Noise and Vibration, p. 13-23; Volume 5, Section 13.3.3.4 Project Residual Effects, p. 13-40.	Construction equipment and generators are assessed as noise and vibration sources. states that vibration from heavy equipment and stationary sources such as generators, crushers, and drilling rigs was assessed and found below applicable annoyance thresholds at receptors, except limited cases such as impact piling within 164 m. However, the assessment would benefit from clearer linkage between equipment assumptions, operating scenarios, and predicted results.	1. Equipment and generator noise and vibration assumptions have not been clearly summarized. 2. Equipment types and operating scenarios used in the assessment have not been clearly identified. 3. It is unclear how predicted effects were assessed at receptors and PDA boundaries.	Please provide a clearer summary of equipment and generator noise/vibration assumptions, including equipment types, operating scenarios, and how predicted effects were assessed at receptors and PDA boundaries.

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NIRB	285.	West Kitikmeot Resources Corp.	Noise and Vibration Impact Assessment – Marine Noise from Shipping and Noise Propagation	Volume 8, Section 23.3.3 Change in Behaviour Caused by Sensory Disturbance, p. 23-68.	Marine noise from shipping and marine construction is assessed. The Impact statements uses marine mammal behavioural disturbance thresholds and discusses vessel noise, pile driving, blasting, dredging, and mitigation. However, for some vessel-related effects, the assessment relies on modelled disturbance distances from other projects because vessel specifications for reasonably foreseeable induced activities are not known.	1. Expected underwater noise propagation from Project-related shipping and marine construction has not been clearly described. 2. Predicted disturbance distances and the assumptions used in the assessment have not been clearly identified. 3. Uncertainty related to vessel specifications has not been adequately assessed.	Please provide additional information on expected underwater noise propagation from Project-related shipping and marine construction activities, including disturbance distances, assumptions used, and how uncertainty from vessel specifications was considered.
NIRB	286.	West Kitikmeot Resources Corp.	Noise and Vibration Impact Assessment – Effects on Humans and Human Activity	Volume 5, Section 13.3.2.4 Project Residual Effects, p. 13-29; Volume 5, Section 13.3.3.4 Project Residual Effects, p. 13-40; Volume 9, Section 24.3.4 Change to Specific Areas of Cultural Importance Where TLMRU Occurs, p. 24-119.	Effects on human receptors and land-use areas are assessed using receptor locations and Traditional Land, Marine, and Resource Use considerations. However, the assessment notes that site-specific or situational mitigation may be required at some receptors and land-use areas. More clarity is needed on how temporary or mobile land users will be identified and protected during noisy activities.	1. Management of noise and vibration effects on human land users and Traditional Land, Marine, and Resource Use activities has not been clearly described. 2. It is unclear how temporary or mobile land users will be identified before blasting, drilling, construction, or other high-noise activities.	Please clarify how noise and vibration effects on human land users and Traditional Land, Marine, and Resource Use activities will be managed, including how temporary/mobile land users will be identified before blasting, drilling, construction, or high-noise activities.
NIRB	287.	West Kitikmeot Resources Corp.	Noise and Vibration Impact Assessment – Marine Mammal Responses	Volume 8, Section 23.3.3 Change in Behaviour Caused by Sensory Disturbance, p. 23-68; Volume 8, Section 23.3.4 Change in Mortality and/or Injury Risk, p. 23-84.	Marine mammal effects from underwater noise are assessed using NOAA behavioural thresholds because Canada does not have formally established behavioural change thresholds for marine mammals. statements predicts that pile driving, blasting, dredging, and vessels may cause localized avoidance, masking, and disturbance.	1. The basis for the selected marine mammal noise thresholds and predicted disturbance distances has not been clearly explained. 2. The effectiveness of ramp-up/soft-start, bubble curtains, blast mats, vessel speed limits, and monitoring in reducing effects on marine mammals has not been demonstrated.	Please clarify the basis for the selected marine mammal noise thresholds, predicted disturbance distances, and how mitigation measures such as ramp-up/soft-start, bubble curtains, blast mats, speed limits, and monitoring will reduce effects to marine mammals.

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NIRB	288.	West Kitikmeot Resources Corp.	Noise and Vibration Impact Assessment – Marine Fish and Benthic Invertebrates	Volume 8, Section 22.3.3 Change in Behaviour Caused by Sensory Disturbance, p. 22-80; Volume 8, Section 22.3.4 Change in Mortality and/or Injury Risk, p. 22-102.	Effects on marine fish and benthic invertebrates are assessed through underwater noise, artificial lighting, water quality, turbidity, dredging, pile driving, blasting, and vessel activity. The assessment discusses localized avoidance and sensory masking, but the noise-specific effects on benthic invertebrates are less clearly separated from broader water-quality and sensory-disturbance pathways.	1. Underwater noise and vibration effects on marine fish and benthic invertebrates have not been clearly assessed as separate pathways. 2. It is unclear how these effects were distinguished from turbidity, artificial lighting, and water quality changes.	Please clarify how underwater noise and vibration effects on marine fish and benthic invertebrates were assessed separately from other sensory disturbance pathways, including turbidity, artificial lighting, and water quality changes.
NIRB	289.	West Kitikmeot Resources Corp.	Noise and Vibration Impact Assessment – Cumulative Noise Effects	Volume 5, Section 13.4 Cumulative Effects, p. 13-55; Volume 1, Section MD.5.3.3 Cumulative Effects, pp. MD-46 to MD-47; Volume 6, Sections 16–18 Wildlife Cumulative Effects.	considers cumulative noise effects from present mineral exploration, reasonably foreseeable induced mines, marine traffic, land transportation, renewable resource harvesting, land-based tourism, and scientific research. However, the cumulative noise assessment is mainly qualitative because public information on noise emission type, quantity, and frequency from other projects is limited. The IS also states that cumulative vibration was not carried forward because vibration is localized and intermittent. Additional clarity is needed on how uncertainty in cumulative noise and vibration effects was considered for land users, wildlife, and marine receptors.	1. Uncertainty in cumulative noise effects has not been adequately assessed. 2. Potential overlap with induced projects, marine traffic, road traffic, air traffic, and other land-use activities has not been clearly considered. 3. The rationale for excluding cumulative vibration effects from further assessment has not been clearly justified.	Please provide additional information on how uncertainty in cumulative noise effects was considered, including potential overlap with reasonably foreseeable induced projects, marine traffic, road traffic, air traffic, and land-use activities, and explain why cumulative vibration effects do not require further assessment.

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NIRB	290.	West Kitikmeot Resources Corp.	Climate Baseline – Meteorological Data Representativeness and Extreme Events	Volume 5, Section 12.3 West Kitikmeot Region Climate Summary; Volume 5, Section 12.3.1 Climate Change Observations in the Kitikmeot Region; Appendix 12A Climate Profile Technical Data Report, Section 5 Climate Data.	Impact Statement provides baseline climate information and climate projections using Inuit, Indigenous, and Community Knowledge together with western climate data. The Climate Profile uses a 1991–2020 baseline and provides projections for the 2030s, 2050s, and 2080s. However, because the Project includes a long road corridor, port, aerodrome, Jericho Station, and shipping route, it is not clear how regional climate datasets and representative climate regions capture local variability, seasonal conditions, and extreme events relevant to Project design and operations.	1. The representativeness of selected climate data sources and climate regions for all Project areas has not been demonstrated. 2. Local climate variability across Grays Bay Port, the road corridor, Jericho Station, the aerodrome, and shipping route has not been clearly addressed. 3. Relevant historical and projected extreme climate events have not been clearly identified. 4. It is unclear how heavy precipitation, high winds, freeze-thaw, snowfall, fog/whiteout, and extreme temperatures were incorporated into Project design and operations.	Please clarify how the selected climate data sources and representative climate regions account for local variability across Grays Bay Port, the road corridor, Jericho Station, the aerodrome, and the proposed shipping route. Please also identify historical and projected extreme climate events relevant to Project design and operations, including heavy precipitation, high winds, freeze-thaw, snowfall, fog/whiteout, and extreme temperature events
NIRB	291.	West Kitikmeot Resources Corp.	Climate Baseline – Climate Trends and VEC Implications	Volume 5, Section 12.3 West Kitikmeot Region Climate Summary, p. 12-8; Appendix 12A, Section 5 Climate Data; Volume 6, Section 14.3.7 Effects of Climate Change on Terrain, Soils, and Permafrost.	discusses climate trends and notes that climate change affects valued ecosystem components, including permafrost, vegetation, water, wildlife, and traditional use. However, the connection between climate trends and implications for each relevant VEC is spread across multiple VC sections and not clearly summarized in one place.	1. The effects of key climate trends on relevant valued ecosystem components have not been clearly summarized. 2. It is unclear how warming, precipitation changes, snow and ice changes, permafrost thaw, and extreme events were incorporated into the assessment.	Please provide a summary explaining how key climate trends, including warming, precipitation change, snow/ice changes, permafrost thaw, and extreme events, may affect relevant valued ecosystem components and how these trends were incorporated into the assessment.

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NIRB	292.	West Kitikmeot Resources Corp.	Climate Impact Assessment – Emission Uncertainty and Low-Confidence Sources	Volume 5, Section 12.4.6 Prediction Confidence and Uncertainty, p. 12-28; Volume 5, Appendix 11A Air Quality Technical Modelling Report, Section 8 Model Prediction Uncertainty.	assessment discusses prediction confidence and uncertainty. For air quality modelling, the technical report notes moderate-to-high confidence for some diesel and power generation emissions, but low confidence for aircraft exhaust emissions and fugitive NO ₂ from blasting because of limited emission factor certainty.	1. Uncertainty associated with low-confidence emission sources, including aircraft emissions and blasting-related NO₂, has not been clearly assessed. 2. It is unclear how this uncertainty was incorporated into the climate and air quality assessment conclusions.	Please clarify how uncertainty in low-confidence emission sources, including aircraft emissions and blasting-related NO ₂ , was considered in the climate and air quality assessment conclusions.
NIRB	293.	West Kitikmeot Resources Corp.	Climate Impact Assessment – Criteria Air Contaminants and Climate Parameters	Volume 5, Section 12.4 Greenhouse Gas Emissions Assessment, p. 12-21; Section 12.4.3 Greenhouse Gas Emissions Quantification, p. 12-23; Volume 5, Section 12.5 Climate Change Risk Assessment, p. 12-29; Appendix 12B Climate Change Risk Assessment Technical Data Report.		1. The relationship between Project-related greenhouse gases, criteria air contaminants, and climate or meteorological effects has not been clearly assessed. 2. It is unclear whether emissions of SO₂, NO_x, CO, VOCs, and O₃ could measurably affect local or regional climate parameters.	Please clarify how Project-related greenhouse gases and criteria air contaminants, including SO ₂ , NO _x , CO, VOCs, and O ₃ , were considered in relation to climate and meteorological effects, and explain whether any of these emissions are expected to measurably affect local or regional climate parameters.

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NIRB	294.	West Kitikmeot Resources Corp.	Climate Impact Assessment – Climate Risk Implementation and Updates Over Project Life	Volume 5, Section 12.5 Climate Change Risk Assessment; Appendix 12B Climate Change Risk Assessment Technical Data Report, Sections 5–7 and Section 10 Summary.	The Climate Change Risk Assessment uses recognized methods and identifies climate-related risks and adaptation recommendations for road system assets, Jericho Station, port marine assets, port landside assets, aerodrome, personnel, and operations. Appendix 12B also recommends that the assessment be revisited when new climate data becomes available or when major asset or infrastructure changes occur. However, it is not clear how the risk findings will be carried into final engineering, operations, maintenance, monitoring, and adaptive management, or whether updates to the CCRA are a firm Project commitment.	1. It is unclear how Climate Change Risk Assessment results and adaptation recommendations will be incorporated into design, operations, maintenance, monitoring, and adaptive management. 2. Application of these measures to the road, port, aerodrome, and Jericho Station has not been clearly described. 3. WKR’s commitment to updating the Climate Change Risk Assessment throughout the Project life is unclear. 4. Triggers, timing, responsibilities, and the use of updated results to inform infrastructure upgrades have not been identified.	Please explain how Climate Change Risk Assessment results and adaptation recommendations will be incorporated into detailed engineering design, operations and maintenance planning, monitoring, and adaptive management for the road, port, aerodrome, and Jericho Station. Please also clarify whether WKR commits to updating the Climate Change Risk Assessment during the Project life, including proposed triggers, timing, responsibilities, and how updates will inform infrastructure upgrades.
NIRB	295.	West Kitikmeot Resources Corp.	Climate Impact Assessment – Cumulative Greenhouse Gas Emissions and Future Development	Volume 5, Section 12.4 Greenhouse Gas Emissions Assessment, p. 12-21; Volume 10, Section 32 Cumulative Effects Assessment Overview, p. 32-9; Volume 2, Section 2.3 Future Development, p. 2-10.	The Project is intended to support future third-party use and future development, including mineral exploration, mine development, increased fuel storage, airstrip expansion, and future road connections. Future development components are outside the current Project scope but are relevant to cumulative effects. Volume 10 states that climate cumulative effects are addressed through Section 12. However, cumulative GHG implications of reasonably foreseeable induced activities and third-party use are not clearly summarized.	1. Cumulative greenhouse gas emissions from reasonably foreseeable induced activities have not been clearly assessed. 2. Emissions associated with third-party users, future mine development, increased traffic, Project expansions, and other related activities have not been adequately considered in the climate assessment.	Please provide additional information on how cumulative greenhouse gas emissions associated with reasonably foreseeable induced activities, third-party users, future mine development, increased traffic, and future Project expansions were considered in the climate assessment.

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NIRB	296.	West Kitikmeot Resources Corp.	Air Quality Baseline – Representativeness of Baseline Data	Volume 5, Section 11.2.3 Baseline Summary, p. 11-23; Appendix 11A Air Quality Technical Modelling Report, Section 3.3 Baseline Ambient Air Quality.	provides baseline ambient air quality information and states that baseline air quality in the LAA is very good. However, the baseline concentrations were determined using information from other recent environmental impact statements and project proposals submitted to NIRB, rather than Project-specific long-term air monitoring. This is understandable for a remote area, but the technical basis for representativeness should be clearer.	1. The representativeness of the selected baseline ambient air quality data for the Project LAA and RAA has not been demonstrated. 2. It is unclear whether conditions at Grays Bay Port, the road corridor, Jericho Station, and areas near quarries and borrow sources are adequately represented.	Please clarify how the selected baseline ambient air quality data are representative of conditions in the Project LAA and RAA, including Grays Bay Port, the road corridor, Jericho Station, and areas near proposed quarries and borrow sources.
NIRB	297.	West Kitikmeot Resources Corp.	Air Quality – Cumulative Emissions, Monitoring, and Adaptive Management	Volume 5, Section 11.2.3 Baseline Summary; Volume 5, Section 11.4.2 Change in Concentrations of Ambient Air Pollutants; Volume 10, Section 32 Cumulative Effects Assessment Overview; Volume 11, Appendix 37C Air Quality Monitoring and Management Plan.	The cumulative air quality assessment states that cumulative effects are possible where emissions from other activities overlap spatially and temporally. It also states that present activities are captured in baseline values and that cumulative effects are unlikely to exceed acceptable levels with mitigation. However, the assessment relies on assumptions about limited overlap, limited public information for future activities, and mitigation by other proponents. It is not clear how monitoring and adaptive management will detect and respond to cumulative air quality effects if future traffic, third-party use, or induced development increases emissions in the Project area.	1. Cumulative air quality effects from overlapping present, foreseeable, and induced activities have not been clearly assessed. 2. Emissions from marine and road traffic, future mine traffic, quarries, camps, aircraft, and fuel storage expansions have not been adequately considered. 3. It is unclear how the Air Quality Monitoring and Management Plan will detect and respond to increased cumulative emissions from future traffic, third-party users, or induced developments.	Please explain how cumulative air quality effects were assessed for overlapping emissions from present, reasonably foreseeable, and reasonably foreseeable induced activities, including marine traffic, road traffic, future mine traffic, quarries, camps, aircraft, and fuel storage expansions. Please also clarify how the Air Quality Monitoring and Management Plan will detect and respond to cumulative air quality effects if future traffic, third-party users, or induced developments increase emissions.

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NIRB	298.	West Kitikmeot Resources Corp.	Air Quality Baseline – Seasonal and Climatic Variability	Volume 5, Section 11.2.3 Baseline Summary, p. 11-23; Appendix 11A, Section 3.2 Climate and Meteorology.	Seasonal and climatic influences on air quality are discussed through meteorology and modelling. Appendix 11A indicates that five years of hourly meteorological data were used, which reduces uncertainty and is consistent with modelling guidance. However, the implications of seasonal conditions, such as wind, snow cover, dry road periods, winter road use, open-water shipping, and dust generation, are not clearly summarized for air quality.	1. It is unclear how seasonal and climatic conditions were incorporated into the air quality baseline and effects assessment. 2. The influence of wind, snow cover, dry road periods, open-water shipping, winter road use, and dust-generating periods has not been clearly assessed.	Please explain how seasonal and climatic conditions, including wind, snow cover, dry road periods, open-water shipping, winter road use, and dust-generating periods, were considered in the air quality baseline and effects assessment.
NIRB	299.	West Kitikmeot Resources Corp.	Air Quality – Fugitive Dust Prediction Confidence and Monitoring	Volume 5, Section 11.3.2.2 Project Effects Pathways; Volume 5, Section 11.3.2.4 Project Residual Effects; Appendix 11A Air Quality Technical Modelling Report, Section 8 Model Prediction Uncertainty; Volume 11, Appendix 37C Air Quality Monitoring and Management Plan.	The Impact Statement assesses fugitive dust from construction, land clearing, quarries, roads, and wind erosion. Appendix 11A identifies lower confidence for fugitive dust emissions and recommends ambient air quality and meteorology monitoring during construction and operations to confirm model predictions and mitigation effectiveness. However, the link between fugitive dust uncertainty, monitoring locations, monitoring triggers, and adaptive management actions is not clearly described.	1. The approach for verifying fugitive dust predictions during construction and operations has not been clearly described. 2. Monitoring locations, indicators, thresholds, and triggers have not been identified. 3. Adaptive management actions for exceedances or ineffective mitigation have not been clearly defined. 4. Model uncertainty for fugitive dust has not been adequately considered in the residual effects conclusions.	Please explain how fugitive dust predictions will be verified during construction and operations, including proposed monitoring locations, monitoring indicators, thresholds/triggers, and adaptive management actions if dust levels exceed predictions or mitigation is not effective. Please also explain how model uncertainty for fugitive dust was considered in residual effects conclusions.

IR Source	IR #	IR Directed To	Subject	IS Reference Reviewed	Reviewer Comments / Reasoning	Missing Information / Gap	Information Requests / IR
NIRB	300.	West Kitikmeot Resources Corp.	Air Quality Impact Assessment – Modelling Domain and Southern Project Area	Volume 5, Section 11.3.2.2 Project Effects Pathways, p. 11-28; Appendix 11A Air Quality Technical Modelling Report.	The air quality modelling focused on the Northern Domain because the Southern Domain emissions were expected to be lower than the worst-case Northern Domain emissions. Appendix 11A notes that Jericho Station emissions during construction are less than half of the Port construction emissions. This rationale is provided, but the technical implications for sensitive receptors and local conditions near Jericho Station and the southern road corridor should be clearer.	1. The rationale for not completing detailed dispersion modelling for the Southern Domain has not been clearly provided. 2. Air quality effects at Jericho Station and along the southern road corridor have not been adequately characterized. 3. It is unclear how local receptors and site-specific meteorological and terrain conditions were considered.	Please clarify why detailed dispersion modelling was not completed for the Southern Domain, including Jericho Station and the southern road corridor, and explain how local receptors and site-specific meteorological or terrain conditions were considered.
NIRB	301.	West Kitikmeot Resources Corp.	Air Quality Impact Assessment – NO ₂ Exceedances and Mitigation	Volume 5, Section 11.3.2.4 Project Residual Effects, p. 11-44; Appendix 11A.	The Impact Statement predicts some exceedances of applicable criteria, particularly 1-hour NO ₂ during construction and operations, although these are described as localized and infrequent. The Executive Summary also notes NO ₂ exceedances near the Port PDA and over Grays Bay. More clarity is needed on how these exceedances will be managed and monitored.	1. Predicted NO₂ exceedances have not been clearly characterized by location, frequency, or affected receptor. 2. Mitigation measures and the proposed monitoring approach for NO₂ exceedances have not been clearly described. 3. Adaptive management actions to be implemented if exceedances occur have not been identified.	Please provide additional detail on the predicted NO ₂ exceedances, including locations, frequency, affected receptors, mitigation measures, monitoring approach, and adaptive management actions if exceedances occur.

IR Source	IR #	IR Directed To	Subject	IS Reference Reviewed	Reviewer Comments / Reasoning	Missing Information / Gap	Information Requests / IR
NIRB	302.	West Kitikmeot Resources Corp.	Air Quality/Terrestrial – Dust and Deposition Effects on Soil, Vegetation, Wildlife, Water, and TLMRU	Volume 5, Sections 11.3.2 and 11.4.2; Volume 6, Section 14.3.3 Change in Soil Properties; Volume 6, Section 15 Vegetation; Volume 6, Section 16 Caribou; Volume 7, Section 20 Freshwater Fish and Fish Habitat; Volume 9, Section 24 Traditional Land, Marine, and Resource Use.	The Impact Statement discusses soil compaction, erosion, spills, dust deposition, air emissions, vegetation effects, wildlife habitat effects, freshwater effects, and TLMRU effects in separate sections. However, the technical connection between predicted dust deposition, soil quality, vegetation quality, wildlife habitat quality, freshwater receptors, and TLMRU/country food use is spread across multiple volumes and is not clearly integrated.	1. Dust deposition and related air emissions have not been clearly assessed across soil, vegetation, wildlife habitat, freshwater fish and fish habitat, and Traditional Land, Marine, and Resource Use. 2. Relevant thresholds, assumptions, and receptor-specific criteria have not been clearly identified. 3. Mitigation and monitoring for cross-VC dust and deposition effects have not been adequately described.	Please explain how predicted dust deposition and related air emissions were considered in the assessments for soil quality, vegetation, wildlife habitat, freshwater fish and fish habitat, and Traditional Land, Marine, and Resource Use. Please identify any thresholds, assumptions, or receptor-specific criteria used, and explain how mitigation and monitoring will address cross-VC dust and deposition effects.
NIRB	303.	West Kitikmeot Resources Corp.	Air Quality Impact Assessment – Human Health Effects from Air Pollutants	Volume 9, Section 26.3.8 Change in Health from Exposure to Pollutants and Hazards, p. 26-66; Volume 9, Appendix 26A Human Health and Ecological Risk Assessment.	The Human Health and Ecological Risk Assessment includes human receptors, chemicals of potential concern, exposure pathways, toxicity assessment, exposure assessment, and risk characterization. However, the connection between predicted air quality exceedances, exposure duration, temporary/seasonal land users, and health risk conclusions should be clearly summarized.	1. It is unclear how predicted NO₂ and particulate matter concentrations were incorporated into the human health risk assessment. 2. Potential health effects on workers, temporary or seasonal land users, and nearby sensitive receptors have not been clearly assessed.	Please provide a summary explaining how predicted air quality results, including NO ₂ and particulate matter, were incorporated into the human health risk assessment for workers, temporary/seasonal land users, and nearby sensitive receptors.
NIRB	304.	West Kitikmeot Resources Corp.	Air Quality Impact Assessment – Greenhouse Gas Contribution to Nunavut and Canada	Volume 5, Section 12.4 Greenhouse Gas Emissions Assessment, p. 12-21.	The Impact Statement assesses the Project's greenhouse gas contribution to Nunavut and Canada. This appears generally addressed. The main technical need is transparency around assumptions and how future third-party use or induced activity is handled.	1. It is unclear whether greenhouse gas estimates are limited to proposed Project activities. 2. Emissions from foreseeable third-party use, induced development, and future traffic using Project infrastructure have not been clearly considered.	Please clarify whether greenhouse gas estimates include only the proposed Project activities or also account for foreseeable third-party use, induced development, and future traffic that may use the Project infrastructure.

IR Source	IR #	IR Directed To	Subject	IS Reference Reviewed	Reviewer Comments / Reasoning	Missing Information / Gap	Information Requests / IR
NIRB	305.	West Kitikmeot Resources Corp.	Ecosystemic Assessment – Integration of Inuit, Indigenous, and Community Knowledge	Volume 4, Section 9.2.3 Incorporation of Engagement and Inuit, Indigenous, and Community Knowledge, p. 9-4; Volume 3, Section 5.4 Integration into Engagement Methods and the Assessment; Volume 5, Section 11.1.1 Air Quality example.	The Impact Statement states that Inuit, Indigenous, and Community Knowledge was incorporated into assessment boundaries, baseline conditions, project effects, cumulative effects, significance, and mitigation. However, because this information is repeated across many VC sections, it is not clear how specific knowledge inputs changed assessment methods, mitigation measures, monitoring, or significance conclusions.	1. It is unclear how Inuit, Indigenous, and Community Knowledge influenced assessment conclusions across ecosystemic VCs. 2. Specific changes to mitigation measures, monitoring programs, and significance determinations resulting from this knowledge have not been clearly identified.	Please provide a summary of how Inuit, Indigenous, and Community Knowledge specifically influenced key assessment conclusions, mitigation measures, monitoring programs, and significance determinations across ecosystemic VCs.

IR Source	IR #	IR Directed To	Subject	IS Reference Reviewed	Reviewer Comments / Reasoning	Missing Information / Gap	Information Requests / IR
NIRB	306.	West Kitikmeot Resources Corp.	Ecosystemic Assessment – Integration of Inuit, Indigenous, and Community Knowledge	Volume 4, Section 9.2.3 Incorporation of Engagement and Inuit, Indigenous, and Community Knowledge, p. 9-4; Volume 3, Section 5.4 Integration into Engagement Methods and the Assessment; Volume 5, Section 11.1.1 Air Quality example.	The Impact Statement States that Inuit, Indigenous, and Community Knowledge was incorporated into assessment boundaries, baseline conditions, project effects, cumulative effects, significance, and mitigation. However, because this information is repeated across many VC sections, it is not clear how specific knowledge inputs changed assessment methods, mitigation measures, monitoring, or significance conclusions. Request additional information in comparison to CGC IR #14 and ADNLC-IR-04.	The IS states that Inuit Qaujimajatuqangit, Indigenous Knowledge and Community Knowledge were central to the assessment but does not demonstrate where or how. Specifically, it does not: identify how IQ/IK/CK framed the effect-pathway determinations for caribou, TLMRU, community health and well-being, food security and food sovereignty, or heritage resources; show whether IQ/IK/CK was applied beyond Valued Component selection — in the modelling, the significance analysis, the Caribou Herd Vulnerability Model, or habitat-selection analyses; describe the methodology by which the Project-specific IQ (including the Banci and Spicker 2024 report) was gathered and validated; or confirm whether the Impact Statement's conclusions were taken back to Knowledge Holders for corroboration. As a result, the influence of IQ/IK/CK on the assessment's conclusions and significance determinations cannot be traced or verified.	Please provide a summary of how Inuit, Indigenous, and Community Knowledge (IQ/IK/CK) specifically influenced key assessment conclusions, mitigation measures, monitoring programs, and significance determinations across the ecosystemic VCs, including specifically caribou, TLMRU, community health and well-being, food security and food sovereignty, and heritage resources. In particular: (1) identify how IQ/IK/CK framed the effect-pathway determinations for each of those VCs; (2) state whether IQ/IK/CK was applied beyond the selection of Valued Components, specifically within the modelling, the significance analysis, the Caribou Herd Vulnerability Model, and habitat/habitat-selection analyses, and demonstrate how; (3) describe the methodology by which the Project-specific IQ referenced throughout the IS (including the Banci and Spicker 2024 report) was gathered and validated, consistent with OCAP principles; and (4) confirm whether the final conclusions of the Impact Statement were brought back to Knowledge Holders to validate or corroborate them, and if so provide an account of those discussions.

IR Source	IR #	IR Directed To	Subject	IS Reference Reviewed	Reviewer Comments / Reasoning	Missing Information / Gap	Information Requests / IR
NIRB	307.	West Kitikmeot Resources Corp.	Ecosystemic Assessment – Indicators, Thresholds, and Significance Criteria	Volume 4, Section 9.2.1 Valued Components, p. 9-3; Section 9.4.1 Project Effects Assessment and Characterization, p. 9-9; Section 9.4.1.4 Significance Determination, p. 9-13; Section 9.5 Monitoring and Adaptive Management, p. 9-18.	The Impact Statement identifies indicators, measurable parameters, residual effects characterization, and significance determinations across VCs. However, the technical justification for why specific indicators and significance thresholds were selected is not easy to trace, especially where thresholds are qualitative or based on professional judgment.	1. The indicators, measurable parameters, and significance thresholds used for each ecosystemic VC have not been clearly consolidated. 2. The rationale for selecting these indicators, parameters, and thresholds has not been adequately explained. 3. It is unclear how community input informed their selection and application.	Please provide a consolidated summary of the indicators, measurable parameters, and significance thresholds used for each ecosystemic VC, including the rationale for their selection and how community input informed them.
NIRB	308.	West Kitikmeot Resources Corp.	Ecosystemic Assessment – Mitigation, Monitoring, and Management Plan Commitments	Volume 4, Section 9.4.1.2 Mitigation Measures; Volume 4, Section 9.5 Monitoring and Adaptive Management; Volume 11, Section 37 Management Plans; relevant VC mitigation and monitoring sections in Volumes 5 to 9.	The Impact Statement identifies mitigation measures across VC sections and includes several draft management plans. However, the linkage between predicted residual effects, mitigation measures, monitoring indicators, thresholds/triggers, adaptive management actions, and management plan commitments is not clearly shown for each VC. Some measures appear to be firm commitments, while others appear to be future planning details.	1. Predicted residual effects have not been clearly linked to mitigation measures, management plans, monitoring indicators, thresholds, follow-up measures, and adaptive management actions. 2. Firm Project commitments have not been clearly distinguished from draft or conceptual measures. 3. The timing and process for finalizing management plans before construction have not been clearly identified. 4. It is unclear how monitoring results will trigger follow-up or adaptive management actions.	Please provide a mitigation and monitoring crosswalk linking predicted residual effects to applicable mitigation measures, management plans, monitoring indicators, thresholds/triggers, follow-up measures, and adaptive management actions. Please also identify which mitigation and monitoring measures are firm Project commitments, which remain draft or conceptual, and the timing/process for finalizing management plans before construction.

IR Source	IR #	IR Directed To	Subject	IS Reference Reviewed	Reviewer Comments / Reasoning	Missing Information / Gap	Information Requests / IR
NIRB	309.	West Kitikmeot Resources Corp.	Ecosystemic Assessment – Spatial Overlap of Effects Across VCs	Volume 4, Section 9.2.4 Assessment Boundaries, p. 9-5; Volumes 5 to 9 VC assessment boundaries.	The Impact Statement defines different Project Development Area, Local Assessment Area, and Regional Assessment Area boundaries for different VCs. This is technically reasonable. However, the IS does not clearly summarize where effects from multiple VCs overlap spatially, such as dust, noise, habitat loss, water crossings, permafrost disturbance, and wildlife movement areas.	1. Areas where residual effects from multiple ecosystemic VCs overlap have not been clearly identified or mapped. 2. Potential overlap near the road, port, aerodrome, quarries, water crossings, and Jericho Station has not been clearly summarized.	Please provide a summary or map showing key areas where residual effects from multiple ecosystemic VCs overlap spatially, including areas near the road, port, aerodrome, quarries, water crossings, and Jericho Station.
NIRB	310.	West Kitikmeot Resources Corp.	Ecosystemic Assessment – Cumulative Effects and Induced Development	Volume 2, Section 2.3 Future Development; Volume 10, Section 32 Cumulative Effects Assessment Overview; Volume 10, Section 32.3 Regional and Future Perspectives; cumulative effects sections in Volumes 5 to 9.	The Project is intended to support future development and third-party use. The Impact Statement discusses future development and reasonably foreseeable induced activities, but it is not clear how induced development was considered consistently across ecosystemic VCs. Several cumulative effects conclusions rely on assumptions that other projects will implement standard mitigation and that residual effects will not exceed acceptable levels. The basis for these assumptions should be clearer, particularly for reasonably foreseeable induced activities.	1. Cumulative effects and reasonably foreseeable induced development have not been clearly assessed across ecosystemic VCs. 2. Assumptions regarding present, reasonably foreseeable, and induced activities have not been adequately described. 3. Future third-party use of Project infrastructure has not been clearly considered. 4. It is unclear how mitigation and monitoring will be coordinated with future induced developments.	Please clarify how cumulative effects and reasonably foreseeable induced development were assessed across ecosystemic VCs, including assumptions for present, reasonably foreseeable, and reasonably foreseeable induced activities. Please explain how future third-party use was considered and how mitigation and monitoring for the proposed Project may be aligned or coordinated with future induced developments.

IR Source	IR #	IR Directed To	Subject	IS Reference Reviewed	Reviewer Comments / Reasoning	Missing Information / Gap	Information Requests / IR
NIRB	311.	West Kitikmeot Resources Corp.	Reasonably foreseeable induced development, Project Inclusion List scope, third-party road use and marine vessel transit	Vol 10, Appendix A (PIL); Vol 1, MD.2; Vol 2, p. 1-14 and Section 6.4; Vol 4 (cumulative effects); Vol 6, Section 16	Arising from KHTO-IR-013 (+ RFI-scope component of KHTO-IR-012), GTC-13, and the RFI/traffic-scenario component of ADNLC-IR-03 and ADNLC-IR-15. All four parties ask overlapping questions about what development and traffic the Project enables and whether the PIL captures it. Vol 2 (p. 1-14) expressly excludes future third-party use and induced development from the effects assessment, while the stated Project purpose is to enable exactly that development. The PIL caps marine components at a 10 km radius although the IS names Tuktoyaktuk, NWT and Montreal, QC as origin ports for direct Project components.	No low/medium/high development scenarios; no third-party traffic scenarios; PIL omits full marine transit routes and Reasonably Foreseeable Induced projects; marine RAA excludes vessel ports of origin; RFI criteria rest on formal regulatory status; no list or map of the induced developments actually used in the CEA.	Provide: (a) low, medium and high reasonably-foreseeable development scenarios reflecting the development the Project is intended to enable (mining expansion, exploration, pipelines, fuel storage, transport infrastructure); (b) the criteria used to determine whether a development is reasonably foreseeable, and how Inuit Qaujimajatuqangit and community knowledge of development trajectories informed that determination rather than formal regulatory status alone; (c) future third-party traffic scenarios (minimum to maximum) covering expected volume, frequency, timing and vehicle type; transport of dangerous goods; noise, vibration, light and other sensory disturbance; potential for harvest and poaching from the road; and the footprint of spur roads and connecting infrastructure; (d) the rationale for limiting marine components on the PIL to a 10 km radius given that Tuktoyaktuk and Montreal transits are direct Project components; (e) an updated PIL and Reasonably Foreseeable Induced list, and an updated marine RAA reflecting ports of origin, or the rationale for not doing so; (f) a list AND map of every induced development and component used in the cumulative effects assessment, with location, length, footprint and zone of influence assumptions for each; and (g) the cumulative effects assessment re-run against (a)-(f), for caribou, sea ice, Inuit harvesting and regional land use. Where already answered under KAA-61, cross-reference rather than repeat.
NIRB	312.	West Kitikmeot Resources Corp.	Exclusion of other caribou herds (Beverly, Beverly/Ahiak, Bluenose-East) from the assessment and from cumulative effects	Vol 6, Sections 16.1 and 16.7 (pp. 16-1, 16-127); Vol 6, VS.6.3 (Caribou); Vol 4 (cumulative effects); Appendix 16B	Arising from GoC-IR 02 and ADNLC-IR-08. Both challenge the treatment of the Bathurst and Dolphin and Union herds as "representative" of mainland and island caribou. GoC targets the spatial scope of the caribou CEA (assessed only within BCH-RAA1 and DUH-RAA, excluding interactions such as the Arctic Economic and Security Corridor, and truncated at the non-biological NU-NWT border). ADNLC targets the exclusion of Beverly caribou specifically, including induced development, hunting access and sensory disturbance.	No assessment of, or reasoned rationale for excluding, other potentially affected herds; caribou cumulative effects assessed only within herd-specific RAAs and truncated at a jurisdictional rather than biological boundary; Beverly herd movement, range use and range shift not analysed.	Provide: (a) assessment of, or a reasoned rationale for excluding, other potentially affected herds including Beverly, Beverly/Ahiak and Bluenose-East the statement that such herds "interact infrequently with the Project; however, when they do, their space use and movements are similar to those of the BCH" is not by itself sufficient; (b) for Beverly caribou, all available data on movement and annual/seasonal range use, including historic, current and potential future range shifts, and their potential interaction with the proposed route, addressing habitat, hunting access, human activity and sensory disturbance; (c) an updated spatial scope for the caribou cumulative effects assessment that is biologically rather than jurisdictionally bounded (i.e. not truncated at the Nunavut-Northwest Territories border) and that captures reasonably foreseeable and induced activities including the Arctic Economic and Security Corridor; and (d) inclusion of Beverly caribou in the induced-development and cumulative-effects analyses.

IR Source	IR #	IR Directed To	Subject	IS Reference Reviewed	Reviewer Comments / Reasoning	Missing Information / Gap	Information Requests / IR
NIRB	313.	West Kitikmeot Resources Corp.	Ecosystemic Assessment – Holistic Effects on Ecosystem Health and Integrity	Volume 10, Section 31 Holistic Assessment; Volume 4, Section 9.4 Impact Assessment Approach.	The Impact Statement includes a holistic assessment, and Volume 10 states that additional assessments supplement the VC assessments. However, the connection between individual VC residual effects and broader ecosystem health and integrity conclusions is not clear.	1. It is unclear how residual effects across individual VCs were considered together. 2. The basis for conclusions on ecosystem health, ecosystem integrity, and the ability of natural systems to maintain structure and function has not been clearly demonstrated.	Please provide a clearer summary explaining how individual VC residual effects were considered together to support conclusions on ecosystem health, ecosystem integrity, and the ability of natural systems to maintain structure and function.
NIRB	314.	West Kitikmeot Resources Corp.	HHERA – Spatial and Temporal Extent of Predicted Contamination	Volume 9, Appendix 26A Human Health and Ecological Risk Assessment, Section 4.1.2, p. 15; Section 4.1.3, p. 28; Section 26.3.8, pp. 26-66 to 26-68.	The Impact Statement identifies human receptors, exposure pathways, and potential contaminants. Section 26.3.8 states that air pollutant health-relevant exposure is limited to within 4 km of the PDA and noise health-relevant exposure is limited to within 1 km of the PDA. However, the spatial and temporal extent of potential contamination pathways across air, soil, water, country foods, and noise is not clearly summarized in one place.	1. The spatial and temporal extent of human and ecological exposure pathways has not been clearly described. 2. Potential exposure through air, soil, surface water, groundwater, country foods, and noise has not been clearly characterized. 3. Construction- and operations-related exposure pathways have not been separately assessed.	Please provide details of the predicted spatial and temporal extent of potential human and ecological exposure pathways, including air, soil, surface water, groundwater, country foods, and noise, for construction and operations.

IR Source	IR #	IR Directed To	Subject	IS Reference Reviewed	Reviewer Comments / Reasoning	Missing Information / Gap	Information Requests / IR
NIRB	315.	West Kitikmeot Resources Corp.	HHERA – COPC Screening and Country Food Exposure Pathways	Volume 9, Appendix 26A Human Health and Ecological Risk Assessment, Sections 4.1.2, 4.1.3, 4.2.2, and 4.2.3; Volume 9, Section 24 Traditional Land, Marine, and Resource Use; Volume 9, Section 25 Food Security and Food Sovereignty.	Appendix 26A includes a screening process for chemicals of potential concern and identifies exposure pathways for human and ecological receptors. The HHERA indicates that some pathways, including soil, surface water, groundwater, and country food pathways, were characterized as inoperable because one or more health risk requirements were absent and no Project-related COPCs were identified. However, the rationale for screening COPCs and country food pathways in or out is not clearly demonstrated across air emissions, dust deposition, soil, water, vegetation, fish, wildlife, and human consumption pathways.	1. Chemicals of potential concern screened in or out by medium and pathway have not been clearly identified. 2. The technical rationale for screening decisions, including toxicity, persistence, and bioaccumulation, has not been adequately explained. 3. Country food exposure pathways, including dust, air, soil, water, vegetation, fish, wildlife, and human consumption, have not been clearly evaluated.	Please identify the chemicals of potential concern that were screened in or screened out by medium and pathway, and provide the technical rationale for each decision, including consideration of toxicity, persistence, and bioaccumulation. Please also explain how country food exposure pathways were evaluated, including potential dust deposition, air emissions, soil/water interactions, vegetation uptake, fish exposure, wildlife exposure, and human consumption.
NIRB	316.	West Kitikmeot Resources Corp.	HHERA – Human Receptors, Exposure Duration, and Exposure Assumptions	Volume 9, Appendix 26A, Section 4.1.1 Human Receptors and Locations, Section 6.0 Exposure Assessment, and Section 9.4 Exposure Duration Uncertainty; Volume 9, Section 26.3.8 Change in Health from Exposure to Pollutants and Hazards; Volume 9, Section 24 Traditional Land, Marine, and Resource Use.	The HHERA identifies human receptors, including off-duty workers, nearby camp users, hamlet residents, and country food harvesters. However, temporary and mobile land users may not be fully represented by fixed receptor locations. The assumptions for exposure duration, exposure frequency, seasonal use, and temporary land use are also not clearly summarized in the main assessment. This makes it difficult to confirm how workers, harvesters, travellers, nearby camp users, and seasonal land users were represented in the exposure assessment.	1. The basis for selecting human receptors has not been clearly explained. 2. Temporary and mobile land users, including harvesters and travellers near roads, ports, quarries, and camps, have not been clearly considered. 3. Exposure duration, frequency, seasonal use, and intake assumptions for each receptor type have not been identified. 4. Uncertainty in the receptor and exposure assumptions has not been adequately assessed.	Please clarify how human receptors were selected and how temporary or mobile land users, including harvesters and travellers near the road, port, quarry areas, or camps, were considered in the exposure assessment. Please identify the exposure duration, exposure frequency, seasonal use, and intake assumptions used for each receptor type, and explain how uncertainty in these assumptions was considered.

IR Source	IR #	IR Directed To	Subject	IS Reference Reviewed	Reviewer Comments / Reasoning	Missing Information / Gap	Information Requests / IR
NIRB	317.	West Kitikmeot Resources Corp.	HHERA – Sensitivity of Receptors and Vulnerable Groups	Volume 9, Appendix 26A, Section 4.1.1 Human Receptors and Locations, p. 12; Volume 9, Section 26.2.2.3 Physical Health Conditions and Outcomes.	The guideline asks for consideration of sensitivity of individuals, including underlying health conditions and culturally significant areas. The IS discusses community health conditions and receptors, but the HHERA does not clearly summarize how sensitive sub-populations, such as children, Elders, people with respiratory conditions, or high country-food consumers, were considered in health risk conclusions.	1. Sensitive human receptors have not been clearly considered in the Human Health Risk Assessment. 2. It is unclear how children, Elders, people with respiratory conditions, and high country-food consumers were assessed.	Please clarify how sensitive human receptors, including children, Elders, people with respiratory conditions, and high country-food consumers, were considered in the Human Health Risk Assessment.
NIRB	318.	West Kitikmeot Resources Corp.	HHERA – Public Concern and Perceived Health Effects	Volume 9, Section 26.2.2.1 Inuit, Indigenous, and Community Knowledge and Engagement Feedback, p. 26-20; Volume 3 engagement records.	Public and Indigenous concerns related to health, dust, contaminants, country foods, and real or perceived effects are discussed. Engagement records show community concerns about dust, contaminants, caribou, road effects, and long-term monitoring. However, the link between perceived health effects, risk communication, mitigation, and follow-up monitoring is not fully clear.	1. It is unclear how public and Indigenous concerns about real or perceived health effects will be addressed. 2. Risk communication measures related to dust, contaminants, country foods, and noise have not been clearly described. 3. Monitoring and adaptive management actions for responding to health concerns have not been clearly identified.	Please explain how public and Indigenous concerns regarding real or perceived health effects, including dust, contaminants, country foods, and noise, will be addressed through risk communication, monitoring, and adaptive management.
NIRB	319.	West Kitikmeot Resources Corp.	HHRA – Significance Criteria for Human Health Risk	Volume 9, Appendix 26A, Section 5.0 Toxicity Assessment, p. 40; Section 7 Risk Characterization, p. 48; Section 10 Conclusions, p. 59.	The concordance table notes that “significance” is an environmental assessment term and that Appendix 26A describes health criteria but does not define what is significant or not. This is important because the guideline asks for criteria used to determine significance of impact.	1. It is unclear how Human Health Risk Assessment results informed the Impact Statement’s significance determination. 2. The health-based criteria or thresholds used to classify effects as adverse, acceptable, or significant have not been clearly identified.	Please clarify how Human Health Risk Assessment results were translated into the Impact Statement’s significance determination, including what health-based criteria or thresholds were used to determine whether effects are adverse, acceptable, or significant.

IR Source	IR #	IR Directed To	Subject	IS Reference Reviewed	Reviewer Comments / Reasoning	Missing Information / Gap	Information Requests / IR
NIRB	320.	West Kitikmeot Resources Corp.	ERA – Ecological Receptors, Pathway Screening, and Toxicity Criteria	Volume 9, Appendix 26A Human Health and Ecological Risk Assessment, Sections 4.2.1 Ecological Receptors, 4.2.2 Identification of Chemicals of Potential Concern, 4.2.3 Exposure Pathways and Conceptual Site Model, Section 5.0 Toxicity Assessment, and Section 7.0 Risk Characterization.	The ERA identifies ecological receptors and exposure pathways and screens some pathways as inoperable or low risk. This may be reasonable, but the rationale should be clearly demonstrated because Project activities include dust generation, fuel use, blasting, road traffic, marine activity, and water crossings. The technical basis for ecological receptor selection, pathway screening, and toxicity criteria is not clearly summarized in one place.	1. The basis for selecting ecological receptors has not been clearly explained. 2. Exposure pathways have not been clearly linked to vegetation, terrestrial wildlife, freshwater fish, marine fish, and marine mammals. 3. The rationale for screening out ecological pathways has not been adequately provided. 4. Potential exposure from dust deposition, spills, blasting residues, water quality changes, and biota uptake has not been clearly assessed. 5. Ecological toxicity criteria or reference values and their application in the risk characterization have not been clearly identified.	Please explain how ecological receptors were selected and how exposure pathways were linked to relevant VCs, including vegetation, terrestrial wildlife, freshwater fish, marine fish, and marine mammals. Please also provide the rationale for ecological pathways that were screened out or not carried forward, including consideration of dust deposition, spills, blasting residues, water quality changes, and biota exposure. Please identify the ecological toxicity criteria or reference values used and explain how they were applied in the risk characterization.
NIRB	321.	West Kitikmeot Resources Corp.	HHERA – Cumulative Human and Ecological Risk	Volume 9, Section 26.4.7 Change in Health from Exposure to Pollutants and Hazards, p. 26-98; Volume 10, Section 32 Cumulative Effects Assessment Overview; Appendix 26A.	HHERA primarily evaluates Project-related pollutants and noise, while cumulative effects are addressed in the community health and cumulative effects sections. Given potential future traffic, induced development, mine traffic, increased marine shipping, camps, and road use, the cumulative exposure basis is not clearly summarized for human and ecological risk.	1. Cumulative human health and ecological risks from overlapping air, dust, noise, water quality, and country food pathways have not been clearly assessed. 2. Potential combined effects from reasonably foreseeable and induced activities have not been adequately considered.	Please provide additional explanation of how cumulative human health and ecological risk from overlapping air emissions, dust, noise, water quality changes, and country food pathways was considered, including reasonably foreseeable and induced activities.

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NIRB	322.	West Kitikmeot Resources Corp.	HHERA – Mitigation, Monitoring, and Risk Management Linkage	Volume 9, Section 26.3.8.2 Mitigation, Management, and Enhancement Measures, p. 26-68; Volume 11 management plans.	Section 26.3.8 states that mitigation from the Air Quality and Noise and Vibration VCs was incorporated into Project design and modelling, and that predicted concentrations and noise levels are not expected to result in adverse health effects. However, the link between HHERA conclusions, monitoring commitments, management plans, and corrective actions is not clearly summarized.	1. HHERA conclusions have not been clearly linked to mitigation measures for air quality, dust, noise, water, soil, and country food pathways. 2. Monitoring indicators and thresholds or triggers for these pathways have not been clearly identified. 3. Adaptive management actions to be implemented when thresholds are approached or exceeded have not been clearly described.	Please provide a summary linking HHERA conclusions to mitigation measures, monitoring indicators, thresholds/triggers, and adaptive management actions for air quality, dust, noise, water, soil, and country food pathways.
NIRB	323.	West Kitikmeot Resources Corp.	Terrestrial Wildlife Baseline – Wildlife Populations, Distribution, and Habitat Use	Volume 6, Appendix 16A Wildlife Baseline Report, Sections 4.2 to 5.6; Volume 6, Sections 16, 17, and 18.	The baseline information is currently difficult to compare across species and study areas. A consolidated table would clearly identify the ecological context, seasonal sensitivities, and spatial importance of habitats used by each VEC. This information is necessary to assess potential project interactions, evaluate the significance of effects, identify data gaps, and confirm that mitigation and monitoring measures are appropriately targeted.	1. Baseline information for key terrestrial wildlife VECs has not been clearly consolidated. 2. Population status, distribution, seasonal habitat use, movement patterns, and important habitat areas have not been clearly compared. 3. Conditions within the Local Study Area and Regional Study Area have not been clearly distinguished.	Please provide a consolidated baseline table or explanation comparing key terrestrial wildlife VECs, including population status, distribution, seasonal habitat use, movement patterns, and important habitat areas within the Local Study Area and Regional Study Area.

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NIRB	324.	West Kitikmeot Resources Corp.	Terrestrial Wildlife Baseline – Biodiversity, Food Chain Relationships, and Inuit/Community Knowledge	Volume 6, Appendix 16A Wildlife Baseline Report, Section 2 Data Sources and Methods; Volume 6, Appendix 16A species sections; Volume 6, Section 16.2.2.1 Inuit, Indigenous, and Community Knowledge and Engagement Feedback.	The Impact Statement includes available published information, field studies, Inuit Qaujimajatuqangit, Indigenous Knowledge, and community knowledge. However, the connection between biodiversity, predator-prey relationships, food chain interactions, and Inuit/community knowledge is not clearly summarized across terrestrial wildlife VECs. This makes it difficult to understand how knowledge sources influenced baseline characterization and assessment conclusions.	1. It is unclear how published information, field studies, Inuit Qaujimajatuqangit, Indigenous Knowledge, and community knowledge were integrated into the terrestrial wildlife baseline. 2. Terrestrial wildlife biodiversity, food chain relationships, and predator-prey interactions have not been clearly characterized. 3. Species-specific baseline conditions and the contribution of each information source have not been clearly explained.	Please explain how published information, field studies, Inuit Qaujimajatuqangit, Indigenous Knowledge, and community knowledge were used to characterize terrestrial wildlife biodiversity, food chain relationships, predator-prey interactions, and species-specific baseline conditions.
NIRB	325.	West Kitikmeot Resources Corp.	Terrestrial Wildlife Baseline – Sensitive Habitat, Critical Habitat, and Habitat Connectivity	Volume 6, Appendix 16A Wildlife Baseline Report, Figures 5.5, 5.9, 5.16, Table 4.1, and species habitat sections; Volume 6, Sections 16.2.2.4, 16.2.2.5, 18.2.2.4, and 18.2.2.5.	The relevant habitat and connectivity information appears to be dispersed across the assessment, making it difficult to understand where important wildlife areas may overlap with or be affected by the Project. A consolidated map or table would provide a clearer spatial and ecological basis for evaluating potential interactions, habitat fragmentation, movement disruption, and effects on sensitive life-history periods. It would also help demonstrate whether avoidance, design modifications, mitigation measures, and residual effects conclusions are appropriately linked to the most important terrestrial wildlife habitats and connectivity features.	1. Key terrestrial wildlife habitat areas and connectivity features have not been clearly mapped or consolidated. 2. Caribou calving and post-calving areas, water crossings, movement corridors, eskers, sensitive species habitat, and predator-prey habitat have not been clearly identified. 3. It is unclear how these areas informed Project design, mitigation measures, and residual effects conclusions.	Please provide a consolidated map or table identifying key terrestrial wildlife habitat areas and habitat connectivity features that may interact with the Project, including caribou calving/post-calving areas, water crossings, movement corridors, eskers, sensitive species habitat, and important predator/prey habitat. Please explain how these areas were considered in Project design, mitigation, and residual effects conclusions.

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NIRB	326.	West Kitikmeot Resources Corp.	Terrestrial Wildlife Impact Assessment – Habitat Loss, Habitat Alteration, and Sensory Disturbance	Volume 6, Sections 16.3, 16.4.1, 16.4.2, 16.4.3, 18.3, 18.4, 18.8, 18.12, and 18.18; Volume 5, Section 13 Noise and Vibration.	Wildlife may be exposed to several Project-related stressors at the same time, and their combined influence may result in greater habitat avoidance, reduced habitat effectiveness, disrupted movement, altered behaviour, or decreased reproductive success than would be predicted by assessing each stressor separately. A clear explanation of the integrated assessment approach is needed to determine whether the full extent, timing, duration, and significance of potential effects have been adequately characterized. This information would also help demonstrate whether species-specific sensitivities and vulnerable life-history periods were appropriately considered in Project design, seasonal restrictions, mitigation, monitoring, and residual effects conclusions.	1. Combined effects from habitat loss, alteration, sensory disturbance, dust, noise, vibration, light, traffic, and human activity have not been clearly assessed. 2. Effects on caribou, muskox, moose, grizzly bear, wolverine, and birds have not been clearly summarized. 3. Sensitive periods, including calving, post-calving, migration, denning, nesting, and wintering, have not been adequately considered.	Please explain how habitat loss, habitat alteration, sensory disturbance, dust, noise, vibration, light, traffic, and human activity were considered together in the effects assessment for key terrestrial wildlife species, including caribou, muskox, moose, grizzly bear, wolverine, and birds. Please identify how sensitive periods, such as calving, post-calving, migration, denning, nesting, and wintering, were considered.
NIRB	327.	West Kitikmeot Resources Corp.	Terrestrial Wildlife Impact Assessment – Movement, Migration, and Barriers to Connectivity	Volume 6, Section 16.2.2.4 Caribou Movements and Distribution; Volume 6, Section 16.4.3 Change in Movement; Volume 6, Section 16.5.1 Quantitative Models; Volume 6, Section 18 species movement sections; Appendix 16A, Figures and species movement/distribution sections.	The Impact Statement includes a long road corridor and associated infrastructure that could affect wildlife movement, migration, habitat connectivity, predator-prey relationships, energy balance, and access to seasonal habitat. The Impact Statement discusses these topics, but the assessment does not clearly summarize how the road and other linear infrastructure may alter movement pathways for key species across seasons and life stages.	1. Potential effects on wildlife movement, migration routes, habitat connectivity, predator-prey dynamics, and access to seasonal habitat have not been clearly assessed. 2. Barrier effects from roads, traffic, snowbanks, infrastructure, and sensory disturbance have not been adequately considered. 3. Species-specific effects on caribou, muskox, moose, grizzly bear, and wolverine have not been clearly described.	Please provide additional information on how the Project may affect terrestrial wildlife movement, migration routes, habitat connectivity, predator-prey dynamics, and access to seasonal habitat. Please explain how potential barrier effects from the road, traffic, snowbanks, infrastructure, and sensory disturbance were considered for key species, particularly caribou, muskox, moose, grizzly bear, and wolverine.

IR Source	IR #	IR Directed To	Subject	IS Reference Reviewed	Reviewer Comments / Reasoning	Missing Information / Gap	Information Requests / IR
NIRB	328.	West Kitikmeot Resources Corp.	Terrestrial Wildlife Impact Assessment – Mortality Risk, Attraction, and Human-Wildlife Interactions	Volume 6, Sections 16.4.4, 18.4.3, 18.8.2, 18.12.3, and 18.16.3; Volume 6, species mortality risk sections; Volume 11 relevant management plans.	The Impact Statement assesses wildlife mortality risk from Project activities, roads, traffic, open water, infrastructure, human presence, attraction to Project facilities, and potential defence of life or property incidents. However, it is not clear how these pathways are integrated across species, Project phases, and locations, or how monitoring and adaptive management will reduce mortality risk.	1. Wildlife mortality risks across Project phases and locations have not been clearly assessed. 2. Risks from wildlife attraction, vehicle collisions, human-wildlife interactions, and defence-of-life/property incidents have not been adequately described. 3. Mitigation, monitoring, reporting, and adaptive management measures to reduce wildlife mortality have not been clearly identified.	Please explain how mortality risk, wildlife attraction, vehicle collisions, increased human-wildlife interactions, and defence-of-life/property incidents were assessed across Project phases and locations. Please identify the mitigation, monitoring, reporting, and adaptive management measures that will be used to reduce wildlife mortality risk.
NIRB	329.	West Kitikmeot Resources Corp.	Terrestrial Wildlife Impact Assessment – Increased Access, Hunting Pressure, and Harvest Monitoring	Volume 6, Section 16.4.4.3 Mitigation, Management, and Enhancement Measures; Volume 6, mortality risk sections for caribou, muskox, moose, grizzly bear, and wolverine; Volume 9, Section 24 TLMRU; Volume 10 cumulative effects sections.	The Impact Statement discusses potential increased hunting pressure, illegal harvest, overharvesting, meat wastage, and interference with harvesters due to improved access. However, the assessment does not clearly explain how increased access along the road will be monitored, who will be responsible for enforcement-related measures, and how concerns related to illegal harvest or harvest pressure will be addressed over the life of the	1. Risks from increased access, illegal harvest, overharvesting, meat wastage, and interference with Inuit harvesters have not been clearly assessed. 2. Roles and responsibilities for harvest pressure and access management have not been clearly identified. 3. Monitoring methods, reporting procedures, and adaptive management measures have not been adequately described.	Please clarify how increased access, potential illegal harvest, overharvesting, meat wastage, and interference with Inuit harvesters will be monitored and managed. Please identify proposed roles, responsibilities, monitoring methods, reporting procedures, and adaptive management measures related to harvest pressure and access management.

IR Source	IR #	IR Directed To	Subject	IS Reference Reviewed	Reviewer Comments / Reasoning	Missing Information / Gap	Information Requests / IR
NIRB	330.	West Kitikmeot Resources Corp.	Terrestrial Wildlife Impact Assessment – Climate Change, Sea Ice, and Cumulative Disturbance	Volume 2, Sections 2.6.2.4 and 2.6.3.3 Project Activities During Construction and Operations; Volume 6, Sections 15.4.7, 18.4.5, 18.8.5, 18.12.5, and 18.16.5 Effects of Climate Change; Volume 10, Section 33.4.3 Caribou; Volume 10 cumulative effects sections.	The Impact Statement discusses climate change effects on terrestrial wildlife, including changes to sea ice, spring break up, fall freeze-up, wildfire, and cumulative disturbance. It also discusses reasonably foreseeable induced development. However, it is not clear how climate-related changes and future development were integrated with Project-related effects on movement, habitat use, mortality risk, and harvesting pressure.	1. The combined effects of climate change, sea ice changes, wildfire risk, cumulative disturbance, and induced development have not been clearly assessed. 2. It is unclear how these factors may interact with Project-related habitat loss, movement barriers, mortality risk, sensory disturbance, and increased access. 3. The implications of these interactions for terrestrial wildlife effects conclusions have not been adequately described.	Please explain how climate change, sea ice changes, wildfire risk, cumulative disturbance, and reasonably foreseeable induced development were considered together in the terrestrial wildlife effects assessment. Please describe how these factors may interact with Project-related habitat loss, movement barriers, mortality risk, sensory disturbance, and increased access.
NIRB	331.	West Kitikmeot Resources Corp.	Terrestrial Wildlife Impact Assessment – Transboundary Effects and Cumulative Caribou Effects	Volume 6, Section 16.6 Transboundary Effects; Volume 10, Section 33.4.3 Caribou; Volume 6, Section 16.5.1 Project Residual Effects Likely to Interact Cumulatively with Residual Effects from Other Physical Activities.	The Impact Statement discusses transboundary effects and cumulative effects for caribou, including potential interactions with other physical activities and induced developments. However, the basis for determining the Project’s contribution to cumulative and transboundary caribou effects is not clearly summarized, especially where induced developments are only evaluated if there is a project interaction.	1. The Project’s contribution to cumulative and transboundary caribou effects has not been clearly assessed. 2. Interactions with induced development, regional access, harvest pressure, road traffic, sensory disturbance, and habitat alteration have not been adequately considered. 3. Uncertainty related to future developments and caribou movement patterns has not been clearly addressed.	Please clarify how the Project’s contribution to cumulative and transboundary caribou effects was assessed, including interactions with induced developments, regional access, harvest pressure, road traffic, sensory disturbance, and habitat alteration. Please explain how uncertainty in future developments and caribou movement patterns was considered.

IR Source	IR #	IR Directed To	Subject	IS Reference Reviewed	Reviewer Comments / Reasoning	Missing Information / Gap	Information Requests / IR
NIRB	332.	West Kitikmeot Resources Corp.	Birds Baseline – Bird Populations, Distribution, Habitat Use, and Sensitive Periods	Volume 6, Section 17.2 Baseline Conditions; Appendix 17A Birds Baseline, Section 3.1 Species Present; Appendix 17A Birds Baseline, Section 4.1 General Information; Appendix 17A Birds Baseline, Section 4.2.1 Spring Migration.	The relevant bird baseline and effects information is dispersed across multiple sections, making it difficult to understand which species and seasonal habitats are most likely to interact with the Project. A consolidated table or explanation would provide a clearer basis for evaluating potential effects on breeding, migration, staging, moulting, foraging, and wintering activities. It would also help demonstrate whether sensitive periods and important habitat areas were appropriately considered in Project design, mitigation, monitoring, and residual effects conclusions	1. Baseline information for key bird species and groups has not been clearly consolidated. 2. Distribution, seasonal habitat use, nesting and staging areas, migration periods, and sensitive periods have not been clearly identified. 3. Project areas where interactions with birds may occur have not been clearly described.	Please provide a consolidated table or explanation identifying key bird species and bird groups, their distribution, seasonal habitat use, nesting/staging areas, migration periods, sensitive periods, and the Project areas where interactions may occur.
NIRB	333.	West Kitikmeot Resources Corp.	Birds Impact Assessment – Habitat Loss, Habitat Alteration, and Sensory Disturbance	Volume 6, Section 17.3 Project Interactions with Birds; Volume 6, Section 17.4.1 Change in Habitat; Volume 6, Section 17.4.2 Change in Mortality Risk.	Birds may be exposed to multiple Project-related stressors simultaneously, and these combined effects may reduce habitat quality or effectiveness, alter behaviour and movement, increase displacement or collision risk, affect food availability, or reduce nesting and reproductive success. A clear explanation of the integrated assessment approach is needed to determine whether the full spatial, temporal, and ecological extent of potential effects on birds and bird habitat has been adequately characterized. This information would also help demonstrate whether sensitive species, important habitats, and vulnerable seasonal periods were appropriately considered in Project design, avoidance measures, timing restrictions, mitigation, monitoring, and residual effects conclusions.	1. Combined effects from habitat loss, habitat alteration, vegetation changes, contaminants, water quality, noise, vibration, traffic, and human activity on birds and bird habitat have not been clearly assessed. 2. Effects during nesting, staging, migration, and other sensitive periods have not been adequately considered.	Please explain how habitat loss, habitat alteration, vegetation effects, contaminants, water quality, noise, vibration, traffic, and human activity were considered together in the assessment of effects on birds and bird habitat, including during nesting, staging, migration, and other sensitive matters.

IR Source	IR #	IR Directed To	Subject	IS Reference Reviewed	Reviewer Comments / Reasoning	Missing Information / Gap	Information Requests / IR
NIRB	334.	West Kitikmeot Resources Corp.	Birds Impact Assessment – Migration Routes, Flight Paths, and Collision Risk	Volume 6, Section 17.3 Project Interactions with Birds; Volume 6, Section 17.4.1 Change in Habitat; Volume 6, Section 17.4.2 Change in Mortality Risk.	The Impact Statement discusses potential alteration of migration routes, flight impact zones, aircraft collision risk, and collision risk with structures, overhead wires, or guy wires. However, the technical basis for how bird movement routes, flight paths, and collision risks were assessed is not clearly summarized.	1. Bird collision risks associated with migration routes, flight paths, aircraft activity, structures, overhead wires, guy wires, and other Project features have not been clearly assessed. 2. Flight impact zones and locations of higher collision risk have not been clearly identified. 3. Mitigation and monitoring measures to reduce bird collision risk have not been adequately described.	Please explain how bird migration routes, flight paths, flight impact zones, aircraft activity, structures, overhead wires, guy wires, and other collision-risk features were assessed. Please identify the mitigation and monitoring measures that will be used to reduce collision risk for birds.
NIRB	335.	West Kitikmeot Resources Corp.	Birds Impact Assessment – Marine Bird Disturbance from Shipping and Ice-Breaking	Volume 6, Section 17.4.1 Change in Habitat; Volume 6, Section 17.4.2 Change in Mortality Risk; Volume 2, Section 2.6.2.4 Project Activities During Construction; Volume 2, Section 2.6.3.3 Project Activities During Operations and Maintenance; Appendix 26A Human Health and Ecological Risk Assessment, Section 4 Problem Formulation.	Marine birds may be particularly sensitive to vessel traffic and construction during migration, staging, moulting, feeding, and breeding periods, when large numbers of birds may be concentrated in specific coastal or offshore areas. Shipping and icebreaking may cause repeated disturbance, displacement from important habitat, changes in movement patterns, and increased collision or mortality risk, while marine construction may alter habitat quality and prey availability. A clear, integrated explanation is needed to determine whether the spatial, seasonal, and cumulative nature of these interactions has been adequately assessed and whether mitigation, monitoring, and adaptive management measures are sufficient to protect important marine bird habitats and sensitive life-history periods.	1. Effects of marine shipping, ice-breaking, vessel traffic, open-water activities, and marine construction on marine birds have not been clearly assessed. 2. Potential disturbance, displacement, mortality, habitat alteration, and effects on migration and staging areas have not been adequately described. 3. Mitigation and monitoring measures for marine bird interactions with shipping have not been clearly identified.	Please explain how marine shipping, ice-breaking, vessel traffic, open-water season activities, and marine construction may affect marine birds, including disturbance, displacement, mortality risk, habitat alteration, migration timing, and staging areas. Please describe mitigation and monitoring measures for marine bird interactions with shipping.

IR Source	IR #	IR Directed To	Subject	IS Reference Reviewed	Reviewer Comments / Reasoning	Missing Information / Gap	Information Requests / IR
NIRB	336.	West Kitikmeot Resources Corp.	Birds Impact Assessment – Ground and Air Traffic Disturbance Near Sensitive Bird Habitat	Birds Impact Assessment – Ground and Air Traffic Disturbance Near Sensitive Bird Habitat	Ground vehicles and aircraft may cause repeated disturbance, displacement, nest abandonment, reduced feeding or resting opportunities, altered migration or staging behaviour, and increased collision or mortality risk. These effects may be more pronounced where traffic occurs frequently, at low altitude, or near areas where birds are concentrated during sensitive life-history periods. A clear description of the proposed restrictions, buffers, monitoring, and adaptive management approach is needed to determine whether disturbance will be effectively avoided or reduced and whether mitigation can be adjusted if monitoring identifies unexpected bird responses or recurring interactions.	1. Management of ground and air traffic disturbance to birds has not been clearly described. 2. Effects near low-level flight corridors, nesting areas, and staging areas have not been adequately addressed. 3. Timing restrictions, setback distances, monitoring, and adaptive management measures for sensitive periods have not been clearly identified.	Please explain how ground traffic and air traffic disturbance to birds will be managed, particularly near low-level flight corridors, nesting areas, staging areas, and during moulting, nesting, migration, and other sensitive periods. Please identify timing restrictions, setback distances, monitoring, and adaptive management measures where applicable.

IR Source	IR #	IR Directed To	Subject	IS Reference Reviewed	Reviewer Comments / Reasoning	Missing Information / Gap	Information Requests / IR
NIRB	337.	West Kitikmeot Resources Corp.	Marine Environment Baseline – Marine Physical Conditions, Sampling Design, and Seasonal Ice Conditions	Volume 8, Sections 21 Marine Water and Sediment, 22 Marine Fish and Fish Habitat, and 23 Marine Mammals; Appendix 21A Marine Water and Sediment Quality; Appendix 22A Marine Fish and Fish Habitat; Appendix 23A Marine Mammals.	A clear and consolidated description of the marine baseline program is needed to determine whether the available information adequately represents the environmental conditions that may be affected by port development, marine construction, shipping, and ice breaking. Marine conditions can vary substantially by location, depth, season, and ice regime, and short-duration or spatially limited sampling may not capture this variability. This information would help demonstrate whether the baseline is sufficiently robust to support the effects assessment, modelling, mitigation measures, monitoring design, and residual effects conclusions, and whether important data gaps or uncertainties have been appropriately addressed.	1. Marine baseline conditions have not been clearly consolidated or characterized. 2. Sampling locations, duration, methods, and use of historical data have not been adequately described. 3. Baseline water quality, sediment quality, bathymetry, sea ice, and seasonal conditions along the shipping route and port area have not been clearly summarized.	Please provide a consolidated explanation of how marine baseline conditions were characterized, including sampling locations, sampling duration, methodology, historical data, water and sediment quality, bathymetry, sea ice conditions, and seasonal conditions along the proposed shipping route and port area.
NIRB (arising from GoC/TC)	338.	West Kitikmeot Resources Corp.	Hydrographic and bathymetric adequacy of the port approach corridor	Vol 2, Section 2.6.1.1 and Table 2.8 (p. 2-28); Vol 8, Section 23; Figure 23.10	Arising from TC-IR 04. This is a substantive information request, not a technical review comment: Transport Canada states the IS does not demonstrate that port approaches have been surveyed to modern standards. The Project Access Corridor boundaries are undefined except as shown in Figure 23.10, yet the IS claims the Project would improve marine safety and navigation.	No demonstration of adequate hydrographic/bathymetric coverage or under-keel clearance for the ~40 nautical mile approach corridor for Post-Panamax OBO ice class 1A vessels (~100,000 DWT, 15 m loaded draught).	Provide: (a) the spatial boundaries of the Project Access Corridor; (b) the existing hydrographic and bathymetric survey coverage of the ~40 nm vessel approach corridor, identifying survey vintage and standard; (c) a demonstration of adequate under-keel clearance for the anticipated vessel classes and drafts, or identification of the survey work required and when it would be undertaken; and (d) the outcome of engagement with the Canadian Hydrographic Service and the Canadian Coast Guard regarding aids to navigation. Where new survey is required, that may be addressed as a licensing-stage deliverable, but the adequacy of existing coverage must be stated now.

IR Source	IR #	IR Directed To	Subject	IS Reference Reviewed	Reviewer Comments / Reasoning	Missing Information / Gap	Information Requests / IR
NIRB	339.	West Kitikmeot Resources Corp.	Marine Environment Baseline – Sensitive Marine Habitat, Anchorage Locations, and Mooring Adequacy	Volume 8, Section 23.2.2.2 Marine Habitat; Appendix 22A Marine Fish and Fish Habitat; Appendix 23A Marine Mammals; Volume 2, Section 2.6.1.1 Port Marine-Based and Landside Infrastructure; Volume 2, Section 2.6.3.3 Operations and Maintenance; Volume 11, Port Management Plan.	Impact Statement identifies sensitive marine habitat, marine fish habitat, marine mammal habitat, bathymetry, and proposed port infrastructure. The concordance table notes that potential safe anchorage locations along the proposed shipping route have not yet been identified and will be included in the Port Management Plan. The adequacy of mooring at wharves and for tugs is also relevant to vessel operations and marine environmental risk.	1. Proposed or potential safe anchorage locations along the shipping route have not been clearly identified. 2. It is unclear how marine habitat, bathymetry, sea ice, currents, marine wildlife use, and vessel safety informed anchorage selection. 3. The adequacy of wharves and tug moorings for the expected vessel types has not been demonstrated.	Please identify proposed or potential safe anchorage locations along the shipping route and explain how marine habitat, bathymetry, sea ice, currents, marine wildlife use, and vessel safety were considered in selecting these locations. Please also explain the mooring adequacy of wharves and tugs for the types of vessels expected to use the port.
NIRB	340.	West Kitikmeot Resources Corp.	Marine Environment Impact Assessment – Marine Water Quality, Sediment Transport, and Wastewater Discharge	Volume 8, Section 21.3.2 Change in Marine Water Quality; Volume 8, Section 21.3.3 Change in Marine Sediment Quality; Volume 8, Section 21.3.6 Effects of Climate Change on Marine Water and Sediment.	Impact Statement assesses potential effects on marine water quality and sediment quality, including tides, waves, currents, sediment transport, construction activities, wastewater discharge, stormwater, discharges to sea, and shoreline effects. However, the technical linkage between marine physical processes, sediment transport, wastewater discharge, shoreline stability, and effects on marine fish and habitat is spread across several sections.	1. The combined effects of tides, waves, currents, sediment transport, wastewater discharge, stormwater runoff, and shoreline stability have not been clearly assessed. 2. Potential effects on marine water and sediment quality have not been adequately described. 3. Effects on marine fish, benthic invertebrates, fish habitat, and sensitive shoreline habitat have not been clearly identified.	Please explain how tides, waves, currents, sediment transport, wastewater discharge, stormwater runoff, and shoreline stability were considered together in the marine water and sediment assessment. Please identify how these pathways may affect marine fish, benthic invertebrates, fish habitat, and sensitive shoreline habitat.

IR Source	IR #	IR Directed To	Subject	IS Reference Reviewed	Reviewer Comments / Reasoning	Missing Information / Gap	Information Requests / IR
NIRB	341.	West Kitikmeot Resources Corp.	Marine Environment Impact Assessment – Propeller Wash, Ballast Water, Invasive Species, and Biofouling	Volume 8, Section 21.3.2 Change in Marine Water Quality; Volume 8, Section 21.4.2 Change in Marine Water Quality – Cumulative Effects; Volume 8, Section 22.3.2.2 Project Effects Pathways; Volume 8, Section 22.3.3 Change in Behaviour Caused by Sensory Disturbance; Volume 8, Section 22.3.4 Change in Mortality and/or Injury Risk.	These pathways may affect multiple marine receptors through both physical and biological mechanisms. Propeller wash can resuspend sediment, increase turbidity, mobilize contaminants, and disturb benthic habitat, while ballast water discharge and vessel biofouling may introduce non-native species or pathogens that could alter marine communities, affect fish health, and reduce habitat quality. A consolidated explanation is needed to determine whether these risks were assessed across the full Project lifecycle and whether the proposed controls, monitoring indicators, response thresholds, and adaptive management measures are sufficient to prevent or address adverse effects.	1. Effects from propeller wash, ballast water discharge, vessel biofouling, and the introduction of non-native species or pathogens have not been clearly assessed. 2. Potential effects on marine water quality, benthic invertebrates, marine fish, and fish habitat have not been adequately described. 3. Mitigation, monitoring, and adaptive management measures for these pathways over the Project lifecycle have not been clearly identified.	Please explain how propeller wash, ballast water discharge, vessel biofouling, and potential introduction of non-native aquatic species or pathogens were assessed for effects on marine water quality, benthic invertebrates, marine fish, and fish habitat. Please describe proposed mitigation, monitoring, and adaptive management measures for these pathways over the Project lifecycle.

IR Source	IR #	IR Directed To	Subject	IS Reference Reviewed	Reviewer Comments / Reasoning	Missing Information / Gap	Information Requests / IR
NIRB	342.	West Kitikmeot Resources Corp.	Marine Environment Impact Assessment – Accidents, Malfunctions, Spills, and Contaminant Pathways	Volume 8, Sections 21.3.2, 22.3.2.2, 22.3.4, 23.3.2.2, and 23.3.4; Volume 9, Appendix 26A Human Health and Ecological Risk Assessment, Section 4 Problem Formulation; Volume 10, Section 34.7.1 Terrestrial and Aquatic Materials Spill.	Accidents and contaminant releases may affect several interconnected marine components simultaneously and may result in immediate, chronic, or delayed effects that extend beyond the initial release area. A clear explanation of how the Volume 10 scenarios informed the Volume 8 receptor-specific assessments is needed to determine whether all credible exposure pathways and ecological consequences were consistently evaluated. This is particularly important for contaminants that may persist in water or sediment, accumulate in organisms, and transfer through marine food chains to fish, marine mammals, wildlife, and human consumers. Additional information on spill prevention, response readiness, monitoring, adaptive management, and the completion of outstanding response-plan sections would help demonstrate that appropriate measures will be in place before Project activities create a risk of marine accidents or contaminant releases.	1. It is unclear how marine accidents, spills, vessel grounding, and contaminant releases were integrated into the marine effects assessments. 2. Potential effects on marine water, sediment, fish, benthic invertebrates, marine mammals, and marine food chains have not been clearly linked. 3. Bioaccumulation pathways have not been adequately assessed. 4. Applicable mitigation, spill response, monitoring, and adaptive management measures have not been clearly identified. 5. The process and timing for finalizing draft or incomplete response plan sections remain unclear.	Please explain how marine accidents, malfunctions, spills, vessel grounding/stranding, and contaminant releases discussed in Volume 10 were integrated into the Volume 8 marine effects assessments for marine water quality, sediment quality, marine fish, benthic invertebrates, marine mammals, and marine food chains. Please also clarify how potential bioaccumulation pathways were considered, and identify the applicable mitigation, spill response, monitoring, and adaptive management measures, including how draft or incomplete response plan sections will be finalized.

IR Source	IR #	IR Directed To	Subject	IS Reference Reviewed	Reviewer Comments / Reasoning	Missing Information / Gap	Information Requests / IR
NIRB	343.	West Kitikmeot Resources Corp.	Marine Wildlife Impact Assessment – Habitat Loss, Behavioural Disturbance, and Underwater Noise	Volume 8, Section 22.3.3 Change in Behaviour Caused by Sensory Disturbance; Volume 8, Section 23.3.2 Change in Habitat; Volume 8, Section 23.3.3 Change in Behaviour Caused by Sensory Disturbance; Volume 8, Section 23.3.4 Change in Mortality and/or Injury Risk.	Underwater noise and sensory disturbance may affect marine fish and mammals through injury, masking, behavioural disturbance, displacement, reduced habitat effectiveness, and disruption of feeding, migration, spawning, or communication. The magnitude and extent of these effects depend on source characteristics, sound propagation conditions, exposure duration, species-specific sensitivity, and the timing and location of activities. A consolidated explanation is needed to determine whether the assessment used appropriate thresholds and assumptions, whether predicted disturbance distances are adequately supported, and whether mitigation and monitoring measures are sufficiently detailed and enforceable. Clear action thresholds and adaptive management procedures are also necessary to ensure that unexpected noise levels, turbidity, or animal responses result in timely modification or suspension of Project activities.	1. Underwater noise and sensory disturbance effects from shipping, pile driving, blasting, dredging, and port operations have not been clearly assessed. 2. Predicted disturbance distances, sound thresholds, key assumptions, and species-specific responses for marine fish and marine mammals have not been clearly identified. 3. Implementation of acoustic and turbidity controls, vibrational pile driving, underwater noise monitoring, and marine mammal monitoring has not been adequately described. 4. It is unclear how monitoring results and sound thresholds will trigger adaptive management actions.	Please clarify how underwater noise and sensory disturbance from shipping, pile driving, blasting, dredging, and port operations were assessed for marine fish, fish habitat, and marine mammals, including predicted disturbance distances, thresholds, key assumptions, and species-specific responses. Please also identify how proposed mitigation and monitoring measures, including acoustic/turbidity reduction measures, vibrational pile driving, underwater noise monitoring, marine mammal monitoring, and sound thresholds, will be implemented and used for adaptive management.

IR Source	IR #	IR Directed To	Subject	IS Reference Reviewed	Reviewer Comments / Reasoning	Missing Information / Gap	Information Requests / IR
NIRB	344.	West Kitikmeot Resources Corp.	Marine Wildlife Impact Assessment – Marine Traffic, Open-Water Season, Ice-Breaking, and Sensitive Periods	Volume 2, Sections 2.6.2.4 and 2.6.3.3 Project Activities During Construction and Operations; Volume 8, Sections 22.3.3, 23.3.3, and 23.3.4; Appendix 12B Climate Change Risk Assessment.	The timing and location of marine traffic may overlap with important seasonal movements and habitat use by marine fish, mammals, and birds. Risks may be greater during spring break-up and fall freeze-up, when open-water and ice-edge habitats are limited and wildlife may be concentrated along migration routes, feeding areas, staging areas, or other sensitive habitats. Ice-breaking and vessel traffic may also cause disturbance, displacement, collision risk, underwater noise, habitat alteration, or changes in access to important areas. A consolidated explanation is needed to determine whether seasonal and ice-related variability was adequately incorporated into the effects assessment and whether timing restrictions, route management, speed controls, monitoring, and adaptive management measures are sufficiently detailed to address unexpected wildlife interactions or changing sea ice conditions.	1. The effects of marine traffic, vessel timing, open-water activities, ice-breaking, spring break up, fall freeze-up, and sea ice conditions have not been clearly assessed. 2. Potential effects on marine fish, marine mammals, and marine birds during sensitive periods have not been adequately described. 3. Timing restrictions, route management, speed controls, monitoring, and adaptive management measures have not been clearly identified.	Please explain how marine traffic, vessel timing, open-water season activities, potential ice-breaking, spring break-up, fall freeze-up, and sea ice conditions were considered in relation to marine fish, marine mammals, and marine birds. Please identify any timing restrictions, route management, speed controls, monitoring, and adaptive management measures for sensitive periods.

IR Source	IR #	IR Directed To	Subject	IS Reference Reviewed	Reviewer Comments / Reasoning	Missing Information / Gap	Information Requests / IR
NIRB	345.	West Kitikmeot Resources Corp.	Sea ice as a receptor: baseline, vessel-induced fragmentation across Coronation Gulf, Inuit travel and harvesting, and under-ice effects on marine wildlife	Vol 2 (marine shipping and ice management); Vol 8, Sections 21 and 23; Vol 6, Section 16 (Dolphin and Union sea-ice crossing); Guideline s. 8.1.14.2	Arising from KHTO-IR-001, KHTO-IR-005 and KHTO-IR-010. Does not include what is already asked for under NIRB-IRs. NIRB-IR-341 covers how marine traffic, vessel timing, ice-breaking, break up/freeze-up and sea-ice conditions were considered for marine fish, mammals and birds, and asks for timing/route/speed controls. It does NOT treat sea ice as a receptor in its own right, does not ask for baseline sea-ice characterisation, does not extend beyond the port vicinity, does not address Inuit travel and harvesting or the Dolphin and Union sea-ice crossing, and does not address under-ice noise propagation or entrapment. Those residual items are asked here.	Sea ice is not carried as a receptor: no baseline characterisation; no assessment of vessel-induced fragmentation across Coronation Gulf beyond the port vicinity; no assessment of effects on Inuit travel, harvesting and cultural practice, or on the Dolphin and Union sea-ice crossing; no under-ice noise or entrapment analysis.	Provide: (a) baseline sea-ice conditions across the marine RAA (extent, thickness, freeze-up and break-up timing); (b) an assessment of vessel-induced sea-ice breakage, fragmentation and accelerated melt attributable to Project-enabled traffic, by season and shipping scenario, extending across Coronation Gulf rather than the port vicinity only, and stating the spatial extent assessed and the rationale for that boundary; (c) the resulting effects on Inuit travel, harvesting and cultural practice, informed by Inuit Qaujimajatuqangit; (d) the resulting effects on the Dolphin and Union herd sea-ice crossing; (e) under-ice noise propagation and the risk of displacement or entrapment of marine wildlife from ice-breaking during spring break-up and fall freeze-up, including the acoustic modelling assumptions used; and (f) cumulative effects of regional marine traffic together with climate-driven sea-ice loss. Where a matter is answered in response to NIRB-IR-341, cross-reference rather than repeat.

IR Source	IR #	IR Directed To	Subject	IS Reference Reviewed	Reviewer Comments / Reasoning	Missing Information / Gap	Information Requests / IR
NIRB	346.	West Kitikmeot Resources Corp.	Marine Wildlife Impact Assessment – Cumulative Effects from Marine Traffic and Project Expansion	Volume 8, Section 21.4.2 Change in Marine Water Quality – Cumulative Effects; Volume 8, Section 22.4.2 Change in Habitat – Cumulative Effects; Volume 8, Section 23.4 Cumulative Effects; Volume 10, Section 32 Cumulative Effects Assessment Overview.	Future increases in shipping, port use, and associated development may interact with Project effects and place additional pressure on marine habitats and species. These effects may occur over broader areas and longer periods than the effects of the Project alone and may involve multiple overlapping pathways. A clear explanation of the cumulative effects approach is needed to determine whether reasonably foreseeable activities and credible future development scenarios were adequately considered. Further information on long-term and regional monitoring, coordination with other operators and regulators, response thresholds, and adaptive management would also help demonstrate that cumulative changes can be identified and addressed before significant adverse effects occur.	1. Cumulative marine effects from increased traffic, induced development, future port use, extended operations, and future shipping have not been clearly assessed. 2. Potential cumulative effects on marine water quality, marine fish, benthic invertebrates, marine mammals, and marine birds have not been adequately described. 3. Monitoring and management measures for cumulative marine effects have not been clearly identified.	Please explain how cumulative marine effects were assessed for increased marine traffic, reasonably foreseeable induced development, future port use, potential extended road and port operations, and future shipping activity. Please describe how cumulative effects on marine water quality, marine fish, benthic invertebrates, marine mammals, and marine birds will be monitored and managed.

IR Source	IR #	IR Directed To	Subject	IS Reference Reviewed	Reviewer Comments / Reasoning	Missing Information / Gap	Information Requests / IR
NIRB	347.	West Kitikmeot Resources Corp.	Marine Wildlife Impact Assessment – Cumulative Effects from Marine Traffic and Project Expansion	Volume 8, Section 21.4.2 Change in Marine Water Quality – Cumulative Effects; Volume 8, Section 22.4.2 Change in Habitat – Cumulative Effects; Volume 8, Section 23.4 Cumulative Effects; Volume 10, Section 32 Cumulative Effects Assessment Overview.	Section 23 treats increased vessel traffic as a primary cumulative stressor but does not quantify the maximum reasonably foreseeable annual shipping scenario, so the upper bound of cumulative effect is untestable. It also assesses only biophysical VCs, omitting cumulative effects on Inuit harvesting and travel safety despite the shipping season overlapping Inuit sea-ice use. KAA-60 supplies both missing limbs — the quantified maximum scenario and the human-use dimension — so the two are merged. Basis: Guideline ss. 8.1.14.2 and 7.4.3.	The IS does not state the maximum reasonably foreseeable annual vessel-traffic scenario underpinning the cumulative marine assessment, so the upper bound of cumulative effect is unquantified, and the assessment cannot be tested against a worst-case case. It also assesses cumulative marine effects only for biophysical VCs (water quality, fish, benthic invertebrates, marine mammals, birds) and does not address cumulative effects of future vessel traffic on Inuit harvesting activities or on-ice and on-water travel safety.	Please explain how cumulative marine effects were assessed for increased marine traffic, reasonably foreseeable induced development, future port use, potential extended road and port operations, and future shipping activity, and describe how cumulative effects on marine water quality, marine fish, benthic invertebrates, marine mammals, and marine birds will be monitored and managed. In addition: (1) provide the maximum reasonably foreseeable annual shipping scenario used as the basis for the cumulative effects assessment, including the vessel numbers, classes and transit assumptions underpinning it; and (2) extend the cumulative effects analysis to Inuit harvesting activities and on-ice and on-water travel safety, not only the biophysical Valued Components. Where already answered under KAA-60, cross-reference rather than repeat.
NIRB	348.	West Kitikmeot Resources Corp.	Sediment Quality - Baseline Information - Sediment modelling should be considered based on the baseline studies and results of the water quality models	Volume 7, Section 19.3.3.4 Project Residual Effects on Surface Water and Sediment Quality (Water Resources). Pg 19-70	The Proponent writes in their comments "With the application of erosion and sediment control measures and location of project activities, sediment modelling was not required based on the type of Project. Sediment loading is typically completed for mining projects, but not for infrastructure projects, unless monitoring resulting warrant it."	1. The requested sediment modelling information has not been provided.	Please provide the requested information of sediment modelling

NIRB	349.	West Kitikmeot Resources Corp.	Sediment Quality - Impact Assessment - The Proponent is required to present a comprehensive impact analysis for all proposed project components and activities, including shipping activities where applicable, on sediment quality; Potential impacts on sediment quality in surrounding lakes and rivers from surface runoff and traffic on proposed project roads and dust from road traffic and other project sources and/or activities;	Volume 7, Section 19.3.3 Change to Surface Water & Sediment Quality, pg. 19-63 and Section 19.3.4 Change in Groundwater Quality, pg. 19-76	The Proponent discusses impacts to sediment quality in surrounding lakes and rivers from surface runoff and traffic on proposed project roads and dust from road traffic and other project sources and/or activities but does not present a comprehensive impact analysis on shipping activities at all.	1. The effects of shipping activities on sediment quality have not been comprehensively assessed. 2. Potential effects from propeller wash, anchoring, vessel grounding, dredging, spills, ballast water discharge, and shoreline disturbance have not been clearly characterized. 3. Sediment resuspension, transport, deposition, contaminant release, and changes in sediment chemistry have not been adequately evaluated. 4. Potential effects on benthic invertebrates, marine fish, fish habitat, marine food chains, and bioaccumulation pathways have not been clearly assessed. 5. Site-specific sediment conditions, shipping frequency, vessel characteristics, seasonal conditions, currents, and sea ice have not been adequately considered. 6. Mitigation, sediment-quality monitoring, thresholds, and adaptive management measures for shipping-related effects have not been clearly identified. 7. Cumulative sediment effects from increased shipping, future port use, and reasonably foreseeable induced activities have not been adequately assessed.	Please provide a comprehensive analysis on shipping activities impacts on sediment quality
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IR Source	IR #	IR Directed To	Subject	IS Reference Reviewed	Reviewer Comments / Reasoning	Missing Information / Gap	Information Requests / IR
NIRB	350.	West Kitikmeot Resources Corp.	Sediment Quality - Impact Assessment - Potential sedimentation and infill rates of drainage areas that might be impacted by the proposed project;	Volume 7, Section 19.3.3 Change to Surface Water & Sediment Quality, pg. 19-63	No information here on sedimentation & infill rates of drainage areas in sections provided	1. Sedimentation and infill rates within drainage areas have not been provided. 2. The potential effects of sediment accumulation on drainage capacity, water flow, and maintenance requirements have not been assessed.	Please provide this information
NIRB	351.	West Kitikmeot Resources Corp.	Sediment Quality - Impact Assessment - Potential impacts on sediment from runoff at fuel storage facilities, with consideration for possible fuel spills and malfunctions;	Volume 7, Section 19.3.3 Change to Surface Water & Sediment Quality, pg. 19-55	Only a quick mention of impacts to sediment from machinery/equipment and vehicle refueling / fuel storage handling. No in detail information on impacts to sediment from runoff at fuel storage facilities, with consideration for possible fuel spills and malfunctions	1. Potential effects of runoff from fuel storage facilities on sediment quality have not been adequately assessed. 2. Contaminant pathways from routine runoff, leaks, spills, equipment failure, and other malfunctions have not been clearly described. 3. The potential transport, deposition, persistence, and accumulation of petroleum hydrocarbons and related contaminants in downstream sediments have not been evaluated. 4. Effects on drainage areas, surface waters, benthic organisms, fish habitat, and aquatic food chains have not been clearly assessed. 5. Spill prevention, containment, runoff controls, sediment monitoring, cleanup criteria, and adaptive management measures have not been adequately described.	Please provide more in detail information on impacts to sediment from runoff at fuel storage facilities, with consideration for possible fuel spills and malfunctions

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NIRB	352.	West Kitikmeot Resources Corp.	Socio-Economic Environment and Impact Assessment - The Impact Statement shall clearly identify and justify the indicators selected and the indicators chosen must be adequate to address all types of foreseeable impacts, including cumulative and residual impacts	Volume 9, Section 27.1.3 Potential Effects, Pathways, and Measurable Parameters, pg. 27-9	Basic information is there, but no specific information on cumulative and residual impacts	1. Cumulative and residual impacts on the selected indicators have not been clearly described. 2. It is unclear how these impacts were assessed, including their magnitude, extent, duration, significance, and interaction with other activities. 3. The effectiveness of mitigation and monitoring in addressing cumulative and residual impacts has not been demonstrated.	Please provide information on cumulative and residual impacts to indicators selected
NIRB	353.	West Kitikmeot Resources Corp.	Non-Traditional Land Use and Resource Use - Impact Assessment - Description of impacts to known non-traditional land and resource use including protected areas, visual and aesthetic resources	Volume 9, Section 29.3.2.4 Change in Land Use Designation - Project Residual Effects, pg. 29-36	Talks about impacts to known non-traditional protected areas, but does not specifically talk about visual and aesthetic resources	1. Impacts on known non-traditional visual and aesthetic resources have not been clearly assessed. 2. The affected viewpoints, landscapes, travel routes, and recreational or visitor-use areas have not been clearly identified. 3. Changes in landscape character, visibility, lighting, infrastructure prominence, and visual quality have not been adequately described. 4. Mitigation, monitoring, and residual effects conclusions for visual and aesthetic impacts have not been clearly provided.	Please provide more details about impacts to known non-traditional visual and aesthetic resources

IR Source	IR #	IR Directed To	Subject	IS Reference Reviewed	Reviewer Comments / Reasoning	Missing Information / Gap	Information Requests / IR
NIRB	354.	West Kitikmeot Resources Corp.	Hydrology Baseline	Volume 7, LAA and RAA boundaries: §19.1.4.1, pp. 19-9–19-13; Figures 19.1 and 19.2, pp. 19-11–19-12. Appendix baseline boundaries: Appendix 19A, §1.2, pp. 2–5; Table 1.1, p. 3; Figures 1.1–1.2, pp. 4–5. Subsurface water: §19.2.2.4, pp. 19-50–19-54. Freeze/melt processes: §19.2.2.2, p. 19-39; Table 19.13, p. 19-43; Appendix 19A, §1.3.3, pp. 9–11; §2.4, p. 13; §3.4, pp. 18–19. The report does not provide separate hydrology-baseline subsections for each individual LAA and RAA.	Does not discuss the specifics of the LAA and RAA. No discussion on subsurface flow, and not much talk about ice formation and melt patterns.	1. Separate subsections for the LAA and RAA have not been provided. 2. Subsurface water conditions and associated ice formation have not been clearly characterized for each study area. 3. Freeze and melt processes, including their timing, extent, and potential effects on terrain, drainage, and infrastructure, have not been adequately discussed.	Include subsections for each LAA and RAA, discuss Subsurface water and ice formation freeze and melt characteristics
NIRB	355.	West Kitikmeot Resources Corp.	Hydrology Baseline	Volume 7, Periods of hydrometric and groundwater records: §19.2.1, p. 19-17; Table 19.5, p. 19-22. Interannual ranges: Appendix 19A, §2.1, p. 12; §3.1, pp. 14–16; Table 3.1, p. 15, which reports minimum and maximum annual runoff. Seasonal variability: Tables 19.11–19.12, pp. 19-41–19-42. Groundwater–surface-water interaction: §19.1.3, p. 19-8; §19.2.2.4, p. 19-50; §19.6.3, p. 19-97. A dedicated year-by-year groundwater and surface-water interaction analysis is not provided.	Does not discuss year to year variability as well as ground and surface water interaction	1. Year-to-year variability in groundwater and surface water conditions has not been clearly characterized. 2. The interaction between groundwater and surface water, including seasonal and interannual changes in recharge, discharge, flow, and water levels, has not been adequately assessed. 3. It is unclear how this variability and interaction were incorporated into the baseline assessment and effects predictions.	Include year to year variability of ground and surface water, as well as their interaction

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NIRB	356.	West Kitikmeot Resources Corp.	Hydrology Baseline	Volume 7, Hydro stratigraphic description of shallow and deep groundwater: §19.2.2.4, pp. 19-50–19-54. Permafrost and active-layer figures: Figures 19.5–19.7, pp. 19-51–19-53. Deep groundwater/talik assessment: §19.3.4.1, pp. 19-72–19-75; Table 19.17, p. 19-73. Hydraulic conductivity values for weathered and fresh bedrock: p. 19-75. Data limitations: §19.6.1, p. 19-96.	Limited discussion on hydrogeological properties of near surface ground water. Discussion on deep ground water is not focus on hydrology	1. Near-surface groundwater conditions, including depth, seasonal variation, flow pathways, and interactions with surface water, have not been adequately characterized. 2. The hydrogeological properties of deeper groundwater systems, including hydraulic conductivity, gradients, aquifer connectivity, recharge, discharge, and groundwater quality, have not been clearly described. 3. Potential connections between shallow and deep groundwater and their implications for Project effects have not been adequately assessed.	Include more discussion on near surface ground water, and focus on hydrogeological properties of deep water
NIRB	357.	West Kitikmeot Resources Corp.	Hydrology Baseline	Voulme7 Talik formation beneath lakes: §19.2.2.4, p. 19-50. Talik identification method: §19.3.4.1, pp. 19-72–19-73; Table 19.17, p. 19-73. Regional distribution: Figure 19.8, p. 19-74. Taliks near road crossings: Figure 19.9 and associated text, p. 19-75, including identification of seven major bridge and four major culvert crossings near potential open taliks. Shoreline-specific talik delineation is not provided	No discussion on Talik distribution on shorelines, beneath water bodies, or at water crossings	1. Talik occurrence, extent, depth, continuity, and seasonal behaviour have not been adequately characterized. 2. The role of taliks in groundwater flow, surface water interaction, and subsurface contaminant transport has not been clearly assessed. 3. Potential effects of Project activities and climate change on talik development and stability have not been adequately considered.	Include more discussion on Taliks

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NIRB	358.	West Kitikmeot Resources Corp.	Hydrology Impact Assessment	Volume 7, Extreme-flow methodology covering 1:2- to 1:100-year events: §19.2.1.1, p. 19-20; Appendix 19A, §2.2, p. 12; §3.2 and Table 3.3, p. 17. Inuit advice on major/high-risk crossings: §19.1.1.5, p. 19-4. Crossing-flow mitigation: §19.3.2.3, pp. 19-61–19-62. Climate-resilient culvert sizing for predicted flows and extreme rainfall: §19.3.7, p. 19-81. Major/high-risk structures, high-water events, ice blockages and steam-truck mitigation: §19.5.3, p. 19-95. The report does not expressly confirm a 1:100-year design event for every crossing.	Missing information or not present where referenced	1. Extreme flow conditions, including freshet and 1:100-year or greater storm events, have not been adequately characterized. 2. It has not been demonstrated that proposed water crossings are appropriately designed and sized to provide sufficient flow capacity during extreme events. 3. Potential risks of overtopping, blockage, erosion, scour, flooding, and infrastructure failure have not been clearly assessed. 4. Mitigation, inspection, maintenance, monitoring, and adaptive management measures for extreme flows and crossing performance have not been adequately described.	Discuss more on extreme flows, as well as more on how the design and size of proposed water crossings ensure adequate flow capacity during freshet or 1:100 year or greater storms. As well as mitigation

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NIRB	359.	West Kitikmeot Resources Corp.	Hydrology Impact Assessment	Volume 7, Component-by-component interaction screening: Table 19.16, pp. 19-55–19-57 . Relevant components include Port landside facilities, aerodrome, Jericho Station, quarries, winter-road construction, camps, water withdrawals and discharges. Context and rationale: §19.3.1, pp. 19-57–19-59 . Water-quantity pathways: §19.3.2.2, pp. 19-59–19-60 . Residual watershed effects: §19.3.2.4, pp. 19-62–19-63 . Existing watersheds and crossing distribution: §19.2.2.2, pp. 19-38–19-39; Appendix 19A, §1.3.4 and Table 1.3, p. 11 . Effects are not quantified separately for every component and watershed.	No discussion on impact of port, Jericho Station, and winter ice road development and other Project components (e.g., quarries,) on water withdrawal or discharge	1. The existing information is broad and does not clearly assess Project effects on individual watersheds. 2. Potential changes to watershed boundaries, drainage patterns, runoff, flow distribution, water balance, and hydrologic connectivity have not been adequately described. 3. Impacts on downstream waterbodies, aquatic habitat, and watershed function have not been clearly assessed.	Information that is present is broad, include discussion on impact to existing watersheds
NIRB	360.	West Kitikmeot Resources Corp.	Hydrology Impact Assessment	Volume 7, Stormwater infrastructure, ditches, berms, culverts and drainage alterations: §19.3.2.2, pp. 19-59–19-60 . Runoff and drainage mitigation: §19.3.2.3, pp. 19-61–19-62 . Localized LAA effects: §19.3.2.4, pp. 19-62–19-63 . Qualitative terrain and hydrology mapping of drainage paths: §19.3.3.1, p. 19-64 . Runoff and contaminant pathways: §19.3.3.2, pp. 19-64–19-65 . A detailed LAA/RAA-wide stormwater or connectivity model is not included.	Limited discussion on stormwater runoff, no detailed LAA/RAA-wide surface water connectivity evaluation	1. Stormwater runoff conditions within the LAA and RAA have not been clearly characterized. 2. Potential changes to runoff volume, flow paths, drainage patterns, and peak flows have not been adequately assessed. 3. Surface water connectivity between Project areas, watercourses, wetlands, lakes, and downstream watersheds has not been clearly described. 4. It is unclear how Project-related changes to stormwater runoff and surface water connectivity were incorporated into the effects assessment and mitigation measures.	Include LAA and RAA storm water run off and surface water connectivity discussion

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NIRB	361.	West Kitikmeot Resources Corp.	Hydrology Impact Assessment	Volume 7, Table 19.16, pp. 19-55–19-57 screens activities during Construction and Operations and Maintenance. Explanatory text appears in §19.3.1, pp. 19-55–19-59 . Effects are subsequently assessed by pathway in §§19.3.2–19.3.4, pp. 19-59–19-78 , rather than through separate detailed assessments for each infrastructure component.	Missing information from some project components	1. Impacts from each major Project infrastructure component have not been clearly assessed within the LAA and RAA. 2. Effects from roads, water crossings, port facilities, the aerodrome, Jericho Station, quarries, borrow areas, camps, and related infrastructure have not been separately described. 3. Construction, operation, maintenance, closure, and post-closure effects on stormwater runoff, drainage patterns, peak flows, erosion, and surface water connectivity have not been clearly evaluated. 4. Infrastructure-specific mitigation and monitoring measures for each Project stage have not been clearly identified.	Include impact from each project infrastructure component from various stages of development

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NIRB	362.	West Kitikmeot Resources Corp.	Hydrology Impact Assessment	Volume 6 and 7, Protection of water and wildlife is identified in §19.1.6, p. 19-15. §19.3.2.4, p. 19-63 states that residual surface-water-quantity effects may interact directly or indirectly with aquatic ecology, vegetation and wildlife. Table 19.9, p. 19-34 recognizes the importance of water quality for wildlife, fish and aquatic life. terrestrial-wildlife-habitat assessment is Chapter 19 and is addressed in Volume 6, Chapters 16–18.	Missing information regarding impact to terrestrial wildlife habitat from the modification or redirection of natural flows	1. Effects of modified or redirected natural flows on terrestrial wildlife habitat have not been clearly assessed. 2. Potential changes to wetlands, riparian areas, vegetation, water availability, and seasonal habitat use have not been adequately described. 3. It is unclear how altered drainage and hydrologic connectivity may affect wildlife movement, habitat quality, and access to feeding, breeding, and refuge areas. 4. Mitigation and monitoring measures to address flow-related habitat effects have not been clearly identified.	Include discussion on the impact to terrestrial wildlife habitat from the modification or redirection of natural flows
NIRB	363.	West Kitikmeot Resources Corp.	Hydrology Impact Assessment	Volume 7, Bridges and culverts are to be sized to accommodate ice: §19.3.2.4, p. 19-63. Major/high-risk structures and ice blockages are discussed in §19.5.3, p. 19-95, including possible use of steam trucks. Culvert de-icing during maintenance is in §20.3.3.3, p. 20-63. No equivalent assessment was found for icing at quarries, embankments, buildings, ditches or other infrastructure.	Discussion on icing of culverts but not other infrastructure/resources	1. Icing risks affecting other Project infrastructure and resources have not been clearly assessed. 2. Potential effects on roads, water crossings, drainage systems, water supplies, facilities, and operations have not been adequately described. 3. Mitigation, monitoring, maintenance, and adaptive management measures for icing-related impacts have not been clearly identified.	Include assessment of icing of other project resources

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NIRB	364.	West Kitikmeot Resources Corp.	Hydrology Impact Assessment	Volume 7, §19.1.2 and Table 19.1, pp. 19-6–19-8 , and the freshwater fish regulatory discussion in §20.1.2 and Table 20.1, pp. 20-6–20-8 . Neither provides a crossing-by-crossing CNWA self-assessment.	No reference to Canadian Navigable Water Act for each water crossing or in stream work	1. A site-specific self-assessment under the Canadian Navigable Waters Act has not been provided for each proposed water crossing or in-stream work location. 2. Navigability of each affected waterbody has not been confirmed. 3. The applicability of the Canadian Navigable Waters Act has not been clearly explained. 4. Required approvals or notifications have not been identified. 5. Location-specific mitigation measures have not been clearly described. 6. Relevant Impact Statement sections, tables, figures, and appendices have not been cross-referenced.	Include self assessment of the CNWA, For each proposed water crossing or in-stream work location, provide: confirmation of whether the waterbody is navigable; an explanation of how the Canadian Navigable Waters Act applies; identification of any required approval or notification; the proposed mitigation measures; and references to the relevant sections, tables, figures, or appendices of the Impact Statement.

IR Source	IR #	IR Directed To	Subject	IS Reference Reviewed	Reviewer Comments / Reasoning	Missing Information / Gap	Information Requests / IR
NIRB	365.	West Kitikmeot Resources Corp.	Hydrology Impact Assessment	Volume 7, Baseline talik conditions: §19.2.2.4, p. 19-50. Talik mapping and crossing proximity: §19.3.4.1, pp. 19-72–19-75; Figures 19.8–19.9, pp. 19-74–19-75. Potential effects of changing permafrost and groundwater pathways: §19.3.4.2, p. 19-76; §19.3.4.4, p. 19-78. Climate-driven changes to taliks: §19.3.7, p. 19-81. Icing: §19.5.3, p. 19-95; §20.3.3.3, p. 20-63.	No discussion on Talik changes on shorelines or water crossing, as well as none on frost bulb or icing formation	1. Potential Project-related changes to talik occurrence, extent, continuity, and groundwater flow have not been clearly assessed. 2. The potential formation or expansion of frost bulbs around roads, culverts, foundations, and other infrastructure has not been adequately considered. 3. Risks of icing formation, including blocked drainage, altered flow paths, flooding, erosion, and infrastructure instability, have not been clearly described. 4. Mitigation, monitoring, maintenance, and adaptive management measures for talik changes, frost bulbs, and icing have not been clearly identified.	Include discussion on how the potential change of taliks, as well as the potential for frost bulbs or icing formation

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NIRB	366.	West Kitikmeot Resources Corp.	Ground and Surface Water Baseline	Volume 7, Hunting and fishing camps, travel ways, harvesting areas, cold-water springs and permanent ice: §19.1.1.1, p. 19-3 . Drinking-water sources: Table 19.9, especially p. 19-29 , identifying large lakes and flowing rivers as preferred sources. Additional sources—lakes, rivers, rock basins, snow, ice and springs: §19.3.3.2, pp. 19-64–19-65 . Recreational-water guidelines are identified in §19.1.2.1, p. 19-8 ,	No discussion on recreational use of water in the area of influence, limited discussion on the lakes and other sources of water as drinking water in the area	1. Recreational uses of waterbodies within the LAA and RAA have not been clearly identified. 2. Activities such as boating, fishing, travel, camping, swimming, and other seasonal water-based uses have not been adequately characterized. 3. An inventory of existing and potential drinking-water sources, including lakes, streams, groundwater, springs, and community or camp water supplies, has not been provided. 4. Potential Project effects on the availability, accessibility, and quality of recreational waters and drinking-water sources have not been clearly assessed.	Discuss the recreational uses of the water in the area as well as an inventory of the other sources of drinking water

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NIRB	367.	West Kitikmeot Resources Corp.	Ground and Surface Water Baseline	Volume 7,	Could not find discussion on isotopes	1. The isotopic composition of groundwater has not been adequately characterized. 2. Isotopic data have not been used to distinguish groundwater sources, recharge conditions, residence times, or connections between shallow groundwater, deep groundwater, surface water, and taliks. 3. Spatial, seasonal, and depth-related variability in groundwater isotopic composition has not been clearly assessed. 4. It is unclear how isotopic information was used to evaluate groundwater flow pathways, mixing, permafrost influence, and potential contaminant transport.	discuss isotopic composition in groundwaters

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NIRB	368.	West Kitikmeot Resources Corp.	Ground and Surface Water Baseline	Volume 7, Physical and hydro stratigraphic characterization: §19.2.2.4, pp. 19-50–19-53; Figures 19.5–19.7, pp. 19-51–19-53. Groundwater chemistry, depth and guideline exceedances: p. 19-54. Hydraulic conductivity: p. 19-75. Data represent regional mine sites rather than a complete LAA dataset; this limitation is acknowledged in §19.6.1, p. 19-96.	Limited discussion on physical and chemical characterizations of groundwater	1. Groundwater within the Local Study Area has not been adequately characterized. 2. Physical conditions, including groundwater levels, temperature, flow direction, hydraulic gradients, conductivity, recharge, discharge, and seasonal variability, have not been clearly described. 3. Chemical conditions, including pH, salinity, major ions, nutrients, metals, hydrocarbons, and other potential contaminants, have not been adequately assessed. 4. Spatial and depth-related differences between near-surface, deep, and talik-associated groundwater have not been clearly identified. 5. Groundwater quality results have not been compared with applicable guidelines or used to establish reliable baseline conditions.	Include groundwater physical and chemical characterizations of the ground water in the Local Study Area

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NIRB	369.	West Kitikmeot Resources Corp.	Ground and Surface Water Baseline	Volume 7, Culturally important gathering places, fishing camps, harvesting areas and water resources are described in §19.1.1.1, p. 19-3 . Water-use knowledge is summarized in Table 19.9, pp. 19-29–19-35 . Reliance on LAA and RAA waterbodies and possible effects on traditional use are discussed in §19.3.3.2, p. 19-64 , with cross-references to Volume 9, Chapters 24 and 25 . Volume 7 does not contain a waterbody-by-waterbody harvesting-importance inventory.	Broad discussion on importance of country food to nearby communities, not focused on the actual water body importance	1. The importance of waterbodies within the Regional Study Area for harvesting activities has not been clearly described. 2. The use of these waterbodies by nearby communities for fishing, hunting, trapping, travel, camping, drinking water, and access to harvesting areas has not been adequately characterized. 3. Seasonal use, culturally important locations, and community dependence on specific waterbodies have not been clearly identified. 4. Potential Project effects on access, water quality, fish and wildlife resources, harvesting success, and continued traditional use have not been adequately assessed.	Discuss the importance of the waterbodies for harvesting activities in the regional study area to nearby communities

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NIRB	370.	West Kitikmeot Resources Corp.	Ground and Surface Water Baseline	Volume 7, Bathymetry was completed for PWI-1 in Appendix 19C, Appendix D – Potential Water Intake Location (PWI-1) Memorandum: §2.1, pp. 2–3; §3.1, p. 7; Figure 1, p. 8 . It reports maximum depth, surface area, volume and bathymetric contours. Appendix 19C also states at §2.2, p. 11 that bathymetric maps were not available for other lake-sampling locations. A complete named-lake bathymetric inventory is not provided.	No discussion on lake bathymetry, only ranges of depths for lakes measured	1. Lake bathymetry within the study areas has not been adequately described. 2. The names and locations of assessed lakes have not been clearly identified. 3. Key bathymetric characteristics, including lake depth, basin shape, shallow areas, volume, and outlet conditions, have not been clearly summarized. 4. It is unclear how lake bathymetry informed water withdrawal, habitat, water quality, hydrology, and effects assessments.	Provide discussion on lake bathymetry, including lake names

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NIRB	371.	West Kitikmeot Resources Corp.	Ground and Surface Water Baseline	Volume 7, §19.1.2.1, pp. 19-7–19-8 explains that federal guidelines cover a broad suite of chemistry parameters, but monitoring focuses on indicator parameters connected to Project stressors and pathways. Methods and selected parameters are in §19.2.1.2, pp. 19-23–19-27 . Baseline results are in §19.2.2.3, pp. 19-44–19-49 . Full supporting dataset: Appendix 19C, §2, pp. 8–11; §§3.1–3.4, pp. 12–17; Appendix E , covering field parameters, general chemistry, nutrients, anions, cations, cyanide and metals.	How were these parameters decided to be discuss? What about other metals and parameters	1. Other relevant water conditions within the watershed and proposed Project area have not been clearly summarized. 2. Seasonal water levels, flow conditions, drainage patterns, water quality, sediment conditions, groundwater interactions, icing, and surface water connectivity have not been adequately characterized. 3. Spatial and year-to-year variability in these conditions has not been clearly described. 4. It is unclear how these water conditions informed the baseline assessment, Project design, mitigation, and effects conclusions.	Provide a summary of other water conditions from the watershed and proposed project area

IR Source	IR #	IR Directed To	Subject	IS Reference Reviewed	Reviewer Comments / Reasoning	Missing Information / Gap	Information Requests / IR
NIRB	372.	West Kitikmeot Resources Corp.	Ground and Surface Water Baseline	Volume 7, Available maps/figures are Figure 19.5 – Estimated Permafrost Thickness, p. 19-51; Figure 19.6 – Measured Active-Layer Thickness, p. 19-52; Figure 19.7 – Average Annual Ground Temperature, p. 19-53; Figure 19.8 – Open Talik Potential, p. 19-74; Figure 19.9 – Crossings and Open Talik Potential Along the Roadway, p. 19-75. Hydro stratigraphic cross-sections, groundwater elevations, potentiometric contours and mapped flow directions were not found.	Missing maps and cross sections of permafrost and hydro stratigraphic units	1. Maps and cross-sections showing permafrost distribution and hydro stratigraphic units have not been provided. 2. The spatial relationships among permafrost, taliks, geological units, aquifers, and confining layers have not been clearly illustrated. 3. Groundwater levels and potentiometric contours within the study area have not been adequately mapped. 4. Groundwater flow directions, recharge and discharge areas, and connections with surface water have not been clearly identified.	Present figures of permafrost and hydro stratigraphic units maps and cross sections. As well include Groundwater levels, potentiometric contours and groundwater flow directions
NIRB	373.	West Kitikmeot Resources Corp.	Ground and Surface Water Baseline	Volume 7, §19.1.1.6, p. 19-5 states that groundwater springs could be sampled as an analogue rather than drilling monitoring wells. §19.3.4.3, p. 19-77 explains that few wells exist, surface-water monitoring may be used as a proxy for shallow groundwater, and groundwater or spring sampling may be undertaken if effects are observed near taliks. Data limitations are acknowledged in §19.6.1, pp. 19-95–19-96.	Conformity Table outlines that no groundwater monitoring wells installed for the Project	1. No groundwater monitoring wells have been installed for the Project. 2. The rationale for not installing groundwater monitoring wells has not been clearly explained. 3. It is unclear how groundwater levels, flow directions, seasonal variability, water quality, and Project-related changes will be assessed without site-specific monitoring wells. 4. The adequacy of existing information to support the groundwater baseline and effects assessment has not been demonstrated.	Include discussion on why these were not considered for the Project

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NIRB	374.	West Kitikmeot Resources Corp.	Ground and Surface Water Baseline	Volume 7, §19.1.3, p. 19-8 states that groundwater-quantity effects are not assessed because no groundwater extraction is planned, shallow groundwater is intimately connected to surface water, and the surface-water-quantity assessment is considered adequate to assess water availability for both systems.	Conformity Table outlines that no groundwater budget as no ground water will be encountered	1. A groundwater budget has not been prepared because the Project assumes groundwater will not be encountered. 2. The technical basis for this assumption has not been clearly demonstrated using site-specific hydrogeological investigations. 3. Potential groundwater occurrence within the active layer, taliks, fractured bedrock, deep groundwater systems, and areas of discontinuous permafrost has not been adequately considered. 4. It is unclear how groundwater inflows, recharge, discharge, surface water interactions, and Project-related changes will be assessed if groundwater is encountered. 5. The adequacy of excluding a groundwater budget from the baseline and effects assessment has not been justified.	Include discussion on why this was not considered for the Project

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NIRB	375.	West Kitikmeot Resources Corp.	Ground and Surface Water Baseline	Volume 7, General shallow groundwater–surface-water connectivity: §19.1.3, p. 19-8. Talik-mediated interaction: §19.2.2.4, p. 19-50. Interaction through runoff, seepage, roads, camps, blasting, fuel areas and other surficial sources: §19.3.4.2, p. 19-76. Monitoring of springs and surface-water proxies: §19.3.4.3, p. 19-77. Climate-driven mixing: §19.6.3, p. 19-97. Detailed interaction with each stream, wetland, spring and other waterbody type is not separately characterized.	Discussion only on how ground and surface water interact via taliks underneath lakes.	1. Groundwater–surface water interactions have only been discussed for taliks beneath lakes. 2. Potential interactions involving rivers, streams, wetlands, ponds, springs, and drainage channels have not been adequately characterized. 3. The role of taliks, the active layer, and unfrozen subsurface pathways in controlling recharge, discharge, baseflow, water levels, water quality, and contaminant transport to other waterbodies has not been clearly assessed.	Include discussion regarding other waterbodies

NIRB	376.	West Kitikmeot Resources Corp.	Ground and Surface Water Impact Assessment	Volume 7, Core pathways and measurable parameters: Table 19.2, p. 19-9. Component interactions: Table 19.16, pp. 19-55–19-57. Surface-water contaminant pathways and metals/metalloids: §19.3.3.1–§19.3.3.2, pp. 19-63–19-65. Groundwater pathways: §19.3.4.2, p. 19-76. ML/ARD source characterization: Appendix 19B. No complete COPC register, source-distance figures, release-pathway maps or synergistic/antagonistic interaction predictions are provided.	Broad discussion on some contaminants and contaminant pathways	1. The discussion of contaminants and contaminant pathways is broad and incomplete. 2. A comprehensive list of potential concern has not been provided for each Project component. 3. The rationale for including or excluding individual contaminants has not been clearly explained. 4. Source-to-receptor distances and figures showing contaminant sources, transport pathways, and affected receptors have not been provided. 5. Release pathways through air, dust, soil, surface water, groundwater, sediment, vegetation, wildlife, fish, and country foods have not been clearly mapped. 6. Potential synergistic and antagonistic interactions among contaminants have not been adequately assessed. 7. Contaminant sources and pathways have not been separately identified for roads, port facilities, aerodrome, Jericho Station, quarries, borrow areas, camps, fuel storage, water crossings, shipping, and related infrastructure. 8. Construction, operation, maintenance, closure, accident, spill, and malfunction scenarios have not been clearly considered.	Provide a full contaminant-of-potential-concern list with rationale, source-distance figures, release pathway mapping, and synergistic/antagonistic interaction predictions. Indicate for all proposed project components
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NIRB	377.	West Kitikmeot Resources Corp.	Ground and Surface Water Impact Assessment	Volume 7, Baseline conditions by Kennarctic River, other streams, lakes and sediment: Appendix 19C, §§3.1–3.4, pp. 12–17 . Project predictions are qualitative in §19.3.3.1–§19.3.3.4, pp. 19-63–19-72 , with predicted geographic extent and magnitude on pp. 19-70–19-71 . Community reliance is discussed on p. 19-64 . No numerical contaminant predictions for each receiving waterbody or complete multi-use waterbody inventory are provided.	Lacking predictions of contaminant increases in different waterbody’s as a result of project activities, or a complete inventory of drinking/recreational/harvesting/fish-bearing waterbodies with contaminant comparisons	1. Predicted contaminant concentrations have not been provided for individual waterbodies potentially affected by the Project. 2. A complete inventory of drinking-water, recreational, harvesting, and fish-bearing waterbodies within the study areas has not been provided. 3. Baseline and predicted contaminant concentrations have not been compared by waterbody, use, Project phase, or contaminant pathway. 4. Contaminant levels have not been clearly compared with applicable drinking-water, recreational-water, aquatic-life, and fish-consumption guidelines. 5. Waterbodies with greater exposure potential or sensitivity to contaminant releases have not been clearly identified.	Include predictions of contaminants in different waterbodies, as well as identify a complete inventory of drinking/recreational/harvesting/fish-bearing waterbodies with contaminant comparisons

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NIRB	378.	West Kitikmeot Resources Corp.	Ground and Surface Water Impact Assessment	Volume 7, Under-ice withdrawal limits and DFO protocol: §19.3.2.3, p. 19-61; §19.3.3.3, p. 19-67. General water-quality effects of withdrawal higher temperature, lower dissolved oxygen and concentration of existing contaminants are described in §19.3.3.2, p. 19-65. A dedicated under-ice water-quality-effects analysis is not provided.	Lacking impact to water quality from water withdrawal under ice	1. Impacts of under-ice water withdrawal on water quality have not been adequately assessed. 2. Potential changes in dissolved oxygen, temperature, mixing, contaminant concentrations, and sediment disturbance have not been clearly evaluated. 3. Effects on winter water levels, under-ice habitat, fish, and aquatic organisms have not been adequately described. 4. Withdrawal limits, monitoring requirements, thresholds, and mitigation measures for under-ice conditions have not been clearly identified.	Include a dedicated assessment of impacts to water quality for withdrawal under ice

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NIRB	379.	West Kitikmeot Resources Corp.	Ground and Surface Water Impact Assessment	Volume 7, Waste and sewage facilities and wastewater treatment are screened as having no freshwater interaction in Table 19.16, pp. 19-56–19-57 . Rationale: §19.3.1, pp. 19-58–19-59 , stating camp wastewater will be disposed of offsite and permanent Port wastewater discharged to the marine environment. §19.3.3.2, p. 19-65 states that sewage will be treated and discharged through a marine outfall or terrestrial sumps. No freshwater/groundwater effluent-dispersion or assimilation model is presented	No discussion on impact of wastewater discharge to the surrounding ground and surface water	1. A dedicated assessment of wastewater treatment plant discharge effects on surface water and groundwater has not been provided. 2. Effluent characteristics, discharge volumes, discharge locations, and receiving-water conditions have not been clearly identified. 3. Water-quality modelling has not been provided to predict contaminant concentrations at the discharge source and downstream receptors. 4. Effluent dispersion, dilution, mixing, and environmental assimilation have not been adequately assessed. 5. Potential effects on surface water, groundwater, sediment, aquatic habitat, fish, and water users have not been clearly evaluated. 6. Seasonal and worst-case conditions, including low flow, under-ice discharge, and treatment-system malfunctions, have not been adequately considered. 7. Monitoring locations, water-quality thresholds, mitigation measures, and adaptive management actions for wastewater discharge have not been clearly identified.	Include a dedicated assessment of impact to ground and surface water from the discharge from a wastewater treatment plant, as well as models to predict water quality from the source and where discharged, and dispersion, dilution and assimilation of effluent discharged to the environment

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NIRB	380.	West Kitikmeot Resources Corp.	Ground and Surface Water Impact Assessment	Volume 7, Dustfall assessment method: §19.3.3.1, p. 19-64. Dust as a sediment/contaminant pathway: §19.3.3.2, pp. 19-64–19-65. Dust controls: §19.3.3.3, p. 19-70. Residual dust effects: §19.3.3.4, pp. 19-70–19-71. Groundwater pathway: §19.3.4.2, p. 19-76. Dustfall monitoring: §19.7, p. 19-97. Effects are not quantified separately for every Project activity.	Dust identified as a contaminant, but lacking information regarding the impact of dust to ground and surface water	1. Dust-related effects on surface water and groundwater have not been clearly assessed for each Project activity. 2. Dust sources from roads, traffic, quarries, borrow areas, blasting, crushing, material handling, port construction, aerodrome operations, camps, and other infrastructure have not been separately identified. 3. Dust deposition, runoff, infiltration, and transport pathways to lakes, streams, wetlands, groundwater, and water crossings have not been adequately characterized. 4. Potential changes to turbidity, suspended solids, sedimentation, pH, metals, nutrients, and other water-quality parameters have not been clearly predicted. 5. Seasonal and cumulative effects, including dry periods, snow accumulation and melt, freshet, and overlapping dust sources, have not been adequately considered. 6. Activity-specific mitigation, monitoring locations, thresholds, and adaptive management measures for dust effects on water have not been clearly identified.	Include the impacts of dust in ground and surface water generated from each project activity

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NIRB	381.	West Kitikmeot Resources Corp.	Ground and Surface Water Impact Assessment	Volume 7, Blasting-related nitrate, nitrite and ammonia pathways: §19.3.3.2, p. 19-65 . Detailed explosives-management discussion: §19.3.3.3, pp. 19-69–19-70 , covering spillage, water in blast holes, incomplete combustion, leaching and runoff. Residual-effect conclusion: §19.3.3.4, p. 19-71 . Waterbody-specific nutrient concentrations are not predicted.	Nutrient input from blasting identified as a contaminant, but lacking information regarding the impact on surface water quality of nearby lakes and streams	1. Potential effects of blasting-related nutrient inputs on nearby lakes and streams have not been adequately assessed. 2. Transport pathways through runoff, seepage, groundwater, and snowmelt have not been clearly characterized. 3. Potential changes to nitrogen concentrations, algal growth, dissolved oxygen, water quality, and aquatic habitat have not been evaluated. 4. Mitigation, monitoring, thresholds, and adaptive management measures for blasting-related nutrient releases have not been clearly identified.	Include discussion on how nutrient input from blasting may affect the surrounding water bodies

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NIRB	382.	West Kitikmeot Resources Corp.	Ground and Surface Water Impact Assessment	Volume 7, Fuel storage and handling interactions: Table 19.16, pp. 19-55–19-57. Hydrocarbon and chemical controls: §19.3.3.3, p. 19-66. Fuel-storage runoff and spills as groundwater pathways: §19.3.4.2, p. 19-76. Hydrocarbon-contaminated runoff from bermed fuel-storage areas and stormwater mobilization: §19.4.3.1, p. 19-87. No quantitative receiving-water prediction is provided.	Runoff at fuel storage sites identified as a contaminant pathway, but lacking information regarding the impact of runoff to ground and surface water	1. Potential effects of runoff from fuel storage sites on surface water and groundwater have not been adequately assessed. 2. Pathways from routine runoff, leaks, spills, and malfunctions through drainage, infiltration, snowmelt, and groundwater flow have not been clearly characterized. 3. Potential changes to water quality from petroleum hydrocarbons, fuels, additives, and related contaminants have not been clearly predicted. 4. Effects on nearby lakes, streams, wetlands, drinking-water sources, fish habitat, and aquatic organisms have not been adequately evaluated. 5. Spill containment, runoff controls, monitoring, cleanup thresholds, and adaptive management measures have not been clearly identified.	Include the impacts of fuel runoff in ground and surface water

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NIRB	383.	West Kitikmeot Resources Corp.	Ground and Surface Water Impact Assessment	Volume 7, 10 Accidental spills are identified in Table 19.2, p. 19-9 and §19.3.4.2, p. 19-76 . Spill prevention plans are identified in §19.3.3.3, p. 19-66 . Detailed accident and malfunction scenarios are explicitly deferred to Volume 10, Chapter 34 .	Accidental spills of fuel or chemicals identified as a contaminant pathway, but lacking information regarding the impact of them to ground and surface water	1. Potential effects of accidental fuel or chemical spills on surface water and groundwater have not been adequately assessed. 2. Spill pathways through runoff, infiltration, snowmelt, drainage systems, groundwater flow, and surface water connectivity have not been clearly characterized. 3. Potential changes to water quality, sediment quality, drinking-water sources, fish habitat, and aquatic organisms have not been clearly evaluated. 4. Spill scenarios, contaminant types, release volumes, affected locations, and downstream transport distances have not been identified. 5. Spill prevention, containment, response, remediation, monitoring, thresholds, and adaptive management measures have not been clearly described.	Include the impacts of fuel or chemical spills in ground and surface water

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NIRB	384.	West Kitikmeot Resources Corp.	Ground and Surface Water Impact Assessment	Volume 7, On-site landfill, hazardous/non-hazardous waste and black/grey water are screened in Table 19.16, pp. 19-56–19-57 . The rationale for camp and Port wastewater is in §19.3.1, pp. 19-58–19-59 , and wastewater pathways are mentioned in §19.3.3.2, p. 19-65 . Historical/legacy sources, including Jericho Mine effluent and seepage, are considered in §19.4.3, pp. 19-87–19-89 , and groundwater cumulative effects in §19.4.4, pp. 19-89–19-91 . No dedicated combined assessment of landfill, landfarming, contaminated soil and sewage effects is provided.	No discussion on impact of landfill disposal, landfarming, contaminated soil/runoff, historical contaminated material management, and sewage effluent discharge to the surrounding ground and surface water	1. A dedicated assessment of effects from landfill disposal, landfarming, contaminated soil and runoff, historical contaminated materials, and sewage effluent on surface water and groundwater has not been provided. 2. Contaminant sources, release pathways, affected locations, and potential downstream or subsurface transport have not been clearly characterized. 3. Potential effects on water quality, sediment, drinking-water sources, fish habitat, and aquatic organisms have not been adequately evaluated. 4. Mitigation, containment, treatment, monitoring, remediation criteria, and adaptive management measures have not been clearly identified.	Include a dedicated assessment of impact to ground and surface water from landfill disposal, landfarming, contaminated soil/runoff, historical contaminated material management, and sewage effluent discharge

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NIRB	385.	West Kitikmeot Resources Corp.	Ground and Surface Water Impact Assessment	Volume 7, Camps are identified as interacting with surface-water quantity, surface-water/sediment quality and groundwater in Table 19.16, p. 19-55 . Mobile-camp water withdrawals and wastewater handling: §19.3.1, p. 19-58; §19.3.2.2, p. 19-59 . Camp wastewater: §19.3.3.2, p. 19-65 . Camp construction/operation as a groundwater pathway: §19.3.4.2, p. 19-76 . A separate camp-specific surface-water assessment is not provided.	No discussion on impact of the construction and operation of camps to the surrounding surface water	1. A dedicated assessment of effects from camp construction and operation on surrounding surface water has not been provided. 2. Potential impacts from land clearing, grading, erosion, stormwater runoff, wastewater discharge, water withdrawal, fuel storage, waste management, spills, and dust have not been clearly assessed. 3. Potential changes to water quality, flow, drainage, sedimentation, fish habitat, and downstream water users have not been adequately evaluated. 4. Camp-specific mitigation, monitoring locations, thresholds, spill response, and adaptive management measures have not been clearly identified.	Include a dedicated assessment of impact to the Construction and operation of camps on surrounding surface water

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NIRB	386.	West Kitikmeot Resources Corp.	Vegetation Baseline - Traditional Knowledge and Community Input Regarding Vegetation VECs	Volume 6, Section 15.2 Baseline Conditions; Appendix 15A Vegetation Baseline Report, Section 5 Results.	The report generally discusses Inuit, Indigenous, and Community Knowledge related to culturally important plant species, harvesting activities, and vegetation resources; however, it is not clear how community-identified vegetation resources and harvesting areas were incorporated into Project planning and the assessment of potential Project effects. Additional clarity is required to understand how community input influenced the identification of valued vegetation components and associated mitigation measures.	1. Community-identified vegetation resources, culturally important plant species, and harvesting areas have not been clearly documented. 2. It is unclear how this information influenced Project planning and the effects assessment. 3. Specific mitigation measures developed to protect important vegetation and harvesting areas have not been clearly identified.	describe how community-identified vegetation resources, culturally important plant species, and harvesting areas were considered in Project planning, the effects assessment, and the development of mitigation measures.
NIRB	387.	West Kitikmeot Resources Corp.	Vegetation Baseline - Vegetation Health and Contaminant Levels	Volume 9, Appendix 26A Human Health and Ecological Risk Assessment, Section 4.1.2.5 Traditional Country Foods; Appendix 15A Vegetation Baseline Report, Section 15A Results	Generally, discusses contaminant pathways through the Human Health and Ecological Risk assessment and concludes that contaminant accumulation in traditional country foods is not expected; however, it is not clear how potential contaminant effects on vegetation VECs were specifically assessed or how the conclusion regarding vegetation health was determined.	1. Potential contaminant exposure and uptake by vegetation VECs have not been clearly assessed. 2. Contaminant pathways through air emissions, dust deposition, soil, surface water, and groundwater have not been adequately described. 3. The evidence supporting the conclusion that Project activities will not adversely affect vegetation health has not been clearly provided. 4. Relevant toxicity thresholds, monitoring indicators, and mitigation measures have not been identified.	clarify how potential contaminant exposure and uptake by vegetation VECs were assessed and identify the information supporting the conclusion that Project activities are not expected to adversely affect vegetation health.

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NIRB	388.	West Kitikmeot Resources Corp.	Public Engagement	Vol. 3, s. 6 Public Engagement, ss. 6.1–6.3, pp. 6-1–6-16; Table 6.1 Summary of 2024–2025 Engagement Activities; Appendices 6A–6E.	Volume 3 describes the engagement approach, categories of engaged parties, engagement methods, historical and current activities, and provides supporting appendices. It also states that engagement inputs were documented through meeting notes, comment logs, recording of key questions, and structured feedback tracking. However, the IS does not present a single auditable engagement-methods matrix showing, for each activity, who participated, why participants were selected, what data were collected, and how the interpretation of input was verified.	The engagement record is dispersed across Section 6 and appendices, and does not clearly link each engagement event to participant selection rationale, data collection method, validation method, and resulting use in the IS. This limits technical reviewers’ ability to evaluate whether engagement information was complete, representative, and correctly interpreted.	Provide a consolidated engagement-methods register that includes: 1. date, location and format of each activity; 2. organizations and participant groups invited and attending; 3. rationale for participant selection; 4. methods used to collect information; 5. information collected; 6. how interpretation and use of the information were verified with participants or organizations; 7. limitations or gaps in participation; and 8. cross-references to where the information influenced the IS.
NIRB	389.	West Kitikmeot Resources Corp.	Public Engagement	Vol. 3, s. 6.2 Methods of Engagement, p. 6-9; s. 6.1.1.4 Socio-economic Engagement, pp. 6-4–6-5; Appendix 6D Socio-economic Community-based Primary Research.	The IS states that methods were selected to support participation by Elders, harvesters, youth, local organizations, Inuit rights-holders, and the broader public, and that 61 interviews with 70 participants included Elders, HTOs, youth, service providers, staff, business organizations, and community members. This partially addresses participant categories, but the IS does not provide a clear GBA+ participation summary by gender, age, harvester status, youth, Elders, vulnerable groups, or other community-relevant factors.	Without a disaggregated participant summary and explanation of gaps in participation, reviewers cannot determine whether engagement adequately captured perspectives of women, youth, Elders, harvesters, people with disabilities, service providers, or other groups who may experience project effects differently.	Provide a GBA+ engagement participation summary that includes: 1. participant categories by community and engagement method; 2. gender, age/youth/Elder, harvester/trapper/hunter, service-provider, business, and vulnerable-group categories where available and appropriate; 3. privacy protections for small communities; 4. identification of under-represented groups; 5. additional engagement proposed to address gaps; and 6. explanation of how disaggregated input informed effects assessment, mitigation, monitoring, and benefit enhancement.

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NIRB	390.	West Kitikmeot Resources Corp.	Public Engagement	Vol. 3, s. 6.1.2 WKR Commitment to Engagement, p. 6-5; s. 6.2 Methods of Engagement, p. 6-9; Table 6.3 Ongoing and Future Engagement Activities, p. 6-16.	Volume 3 states that engagement is designed to reflect Inuit values, community preferences and cultural protocols, with support through Inuinnaqtun and Inuktitut interpretation, radio, posters, social media, printed notices and plain-language summaries. Table 6.3 also commits to interpretive support and materials in English, Inuinnaqtun and Inuktitut. The IS does not provide a detailed event-by-event language record confirming what interpretation or translated material was provided at each meeting.	The IS does not clearly demonstrate whether live interpretation, dialect-specific support, translated materials, plain-language materials, and return-of-results materials were consistently provided across each community, each public meeting, and each technical session.	Provide a communication-accessibility table for each engagement activity identifying: 1. language(s) and dialect(s) used; 2. whether live interpretation was provided; 3. translated materials provided; 4. plain-language materials provided; 5. radio or oral communication methods used; 6. accessibility measures such as childcare-friendly venues or timing around harvesting; 7. community feedback on whether communication methods were effective; and 8. changes made to future engagement methods.
NIRB	391.	West Kitikmeot Resources Corp.	Public Engagement	Vol. 3, s. 6.1.1 Overview of Engaged Parties, pp. 6-2–6-4; s. 6.2 Methods of Engagement, p. 6-9; Appendix 6C Current Engagement Meetings; Appendix 6E Historical Engagement Activities.	Volume 3 identifies broad categories of engaged parties, including Kitikmeot communities, HTOs, KIA, Indigenous groups outside Nunavut, transboundary organizations, municipalities, schools, agencies and service providers. It also identifies distribution mechanisms such as website, social media, emails, posters, radio, public meetings and open houses. However, the IS does not provide a complete distribution log showing what information was sent to which organization or individual and when.	The absence of a distribution log makes it difficult to verify whether all potentially affected groups received timely, understandable, and current project information, particularly where design changes, mitigation commitments, or technical study results were shared.	Provide a project-information distribution log that includes: 1. date of distribution; 2. material or update distributed; 3. recipients or recipient category; 4. language and format; 5. method of distribution; 6. whether follow-up or confirmation of receipt occurred; 7. whether the distributed information related to project changes or technical results; and 8. any gaps or planned corrective outreach.

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NIRB	392.	West Kitikmeot Resources Corp.	Public Engagement	Vol. 3, Table 6.2 Summary of Key Issues Raised During Engagement, pp. 6-12–6-15; s. 6.3.3 Summary of Key Issues; Appendix 6A IAG Workshop Summaries; Appendix 6D Socio-economic Community-based Primary Research.	Table 6.2 summarizes key issues raised and identifies groups raising issues, WKR responses, and where addressed. Issues include caribou, aquatic resources, TLMRU, access, employment, cost of living, infrastructure, and cumulative effects. The summary is useful, but it is selective and does not clearly identify whether it captures all issues from all engagement activities, nor does it provide issue frequency, unresolved concerns, or a group-by-impact-category crosswalk.	The IS lacks a complete issue-tracking table organized by group and impact category. Without this, reviewers cannot easily determine whether concerns from different communities or rights-holders were carried through to baseline characterization, effects assessment, mitigation, significance, and follow-up.	Provide a complete engagement issue-response register that includes: 1. all issues raised by engagement activity and group; 2. impact category; 3. affected VC or project component; 4. whether the issue is resolved, partially resolved, unresolved, or ongoing; 5. WKR response; 6. where the issue is addressed in the IS; 7. whether the issue changed project design, mitigation, monitoring, or significance; and 8. planned follow-up with the originating group.
NIRB	393.	West Kitikmeot Resources Corp.	Public Engagement	Vol. 3, s. 6.3.4 Response to Community Feedback, pp. 6-15–6-16; Table 6.4 Construction and Operations and Maintenance Phase Commitments, pp. 6-17–6-18; Vol. 11 EMS and management plans.	Volume 3 commits to maintaining an engagement database, using feedback to influence decisions where appropriate, reporting back on whether input was incorporated, and ongoing engagement throughout project phases. However, the IS does not provide a systematic table of conclusions that differ from community views or explain the rationale for not adopting specific community recommendations.	The Guideline specifically requires rationale for conclusions differing from community views. The IS uses general commitments but does not identify each instance where WKR disagreed with, modified, deferred, or did not adopt community input, nor does it specify how those differences will be addressed over the life of the Project.	Provide a community-view reconciliation table that includes: 1. each concern or recommendation; 2. the community/group raising it; 3. WKR's conclusion or decision; 4. whether WKR adopted, partially adopted, deferred, or rejected the input; 5. rationale for any differing conclusion; 6. any additional analysis or engagement completed; 7. measures committed to address the concern; and 8. life-of-project follow-up actions and reporting commitments.
NIRB	394.	West Kitikmeot Resources Corp.	Public Engagement	Vol. 3, Table 6.3 Ongoing and Future Engagement Activities, p. 6-16; Table 6.4 Construction and Operations and Maintenance Phase Commitments, pp. 6-17–6-18; Vol. 11 EMS and monitoring plans.	Volume 3 includes commitments to regular community visits/open houses, targeted group meetings, IAG meetings, digital outreach, public meetings, training engagement, annual community visits and communication of monitoring results. This addresses ongoing engagement during design, construction and operations. The post-closure component is not clearly developed, consistent with the broader closure gap for permanent infrastructure.	The engagement plan does not clearly describe phase-specific engagement through temporary closure, reduced operations, permanent closure, post-closure, infrastructure transfer, abandonment, or long-term stewardship. This is important because monitoring, access, maintenance, and residual effects may continue beyond active operations.	Provide a life-of-project engagement plan that includes: 1. engagement activities by phase, including construction, operations, reduced operations, care and maintenance, closure, and post-closure; 2. frequency and responsible party; 3. communities and organizations to be engaged; 4. reporting of monitoring results; 5. procedures for revisiting unresolved concerns; 6. engagement linked to management-plan updates; and 7. how community input will influence post-closure or long-term stewardship decisions.

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NIRB	395.	West Kitikmeot Resources Corp.	Public Engagement	Vol. 3, s. 4.3 Details and Outcomes, p. 4-5; s. 5.4 Integration into Engagement Methods and the Assessment, pp. 5-3-5-8; s. 6.3.4 Response to Community Feedback, pp. 6-15-6-16.	Volume 3 states that feedback informed baseline understanding, potential effects and pathways, mitigation and enhancement measures, cumulative effects, significance, monitoring, management plans, and project design. Section 5 provides examples, including caribou migration as a priority, fish timing, caribou culvert recommendations, calving concerns, and changes to timing of planned road construction activities. The IS does not provide a complete traceable decision record.	The IS gives examples of engagement influence but does not comprehensively trace engagement input to specific design changes, scoping decisions, baseline datasets, mitigation commitments, monitoring indicators, or follow-up programs across all VCs.	Provide an engagement-to-decision traceability matrix identifying: 1. engagement input; 2. source group/community; 3. related project component or VC; 4. decision area affected; 5. specific IS section, design change, mitigation, monitoring measure, or significance criterion influenced; 6. whether input remains unresolved; and 7. planned follow-up.

IR Source	IR #	IR Directed To	Subject	IS Reference Reviewed	Reviewer Comments / Reasoning	Missing Information / Gap	Information Requests / IR
NIRB	396.	West Kitikmeot Resources Corp.	Government Engagement Activities	Volume 3, Section 6.3.2	As part of the IS Guidelines, the NIRB specifically requested that the proponent demonstrate how engagement was conducted with both the public and governments. While WKR appears to have undertaken recent engagement with Kitikmeot communities and Indigenous organizations, the draft IS relies largely on historical engagement with government organizations dating back to 2016–2017, with limited evidence of recent engagement activities with federal, territorial, and regional government departments during the preparation of the draft IS (2024–2025). Given the time elapsed since many of the government engagement activities referenced in the draft IS, it is unclear whether federal, territorial, and regional government organizations were provided with opportunities to review updated Project information, identify current concerns, and provide input into the environmental and socio-economic assessment. Consequently, it is difficult to determine whether the draft IS reflects current information, regulatory requirements, and government perspectives.	1. Recent engagement with federal, territorial, and regional government organizations during 2024–2025 has not been clearly documented. 2. The rationale for relying on historical engagement from 2016–2017 has not been adequately explained. 3. Government comments, concerns, and recommendations have not been clearly linked to Project design, mitigation, monitoring, and the effects assessment. 4. The approach for continued and meaningful government engagement throughout regulatory review and future Project phases has not been clearly described.	The Proponent should provide the following for review: a) A description of all engagement activities undertaken with federal, territorial, and regional government organizations during preparation of the draft IS (2024–2025), including the organizations contacted, dates of engagement, methods of engagement, and topics discussed. b) An explanation of why historical engagement activities conducted between 2016 and 2017 are considered sufficient to demonstrate current government engagement, if no recent engagement was undertaken. c) A summary of comments, concerns, recommendations, or information provided by government organizations and how these inputs have been incorporated into the Project design, mitigation measures, monitoring programs, and effects assessment. d) An explanation of how the proponent will ensure continued and meaningful engagement with government organizations throughout the regulatory review process and subsequent phases of the Project.

IR Source	IR #	IR Directed To	Subject	IS Reference Reviewed	Reviewer Comments / Reasoning	Missing Information / Gap	Information Requests / IR
NIRB	397.	West Kitikmeot Resources Corp.	Methods for Gathering Inuit Qaujimaningit, Indigenous Knowledge, and Community Knowledge	Vol. 3, s. 4.1 Approaches for Gathering Inuit Knowledge, Indigenous Knowledge and Community Knowledge, pp. 4-1–4-4; s. 4.2 Managing Confidential Information, pp. 4-4–4-5; s. 4.3 Details and Outcomes, p. 4-5; s. 5 Integration, pp. 5-1–5-9.	Volume 3 describes the principal knowledge sources, including the NTKP, the Project-specific Kitikmiut Knowledge report, the Inuit Advisory Group, public engagement, and community-based primary research. It also states that information was reviewed and consolidated in an internal knowledge tracking database and categorized into VC-specific topics. This demonstrates the existence of a methodology at a high level, but it does not provide enough detail for a technical reviewer to reproduce or audit how knowledge was coded, interpreted, validated, weighed, or carried into each VC assessment.	No stand-alone methods appendix or detailed workflow is provided for coding, analysis, verification/validation, interpretation, quality control, or transfer of knowledge inputs into the VC assessments. This limits transparency on how the Proponent moved from knowledge gathering to assessment conclusions.	Provide a Section 10.1 knowledge-methods addendum that includes: 1. all data sources used; 2. collection and engagement methods by source; 3. coding/categorization methods; 4. analytical steps used to interpret knowledge; 5. verification/validation steps; 6. roles and qualifications of those conducting documentation, analysis, and validation; 7. how knowledge was linked to VC pathways, boundaries, mitigation, monitoring, and conclusions; and 8. limitations and uncertainty for each knowledge source.
NIRB	398.	West Kitikmeot Resources Corp.	Methods for Gathering Inuit Qaujimaningit, Indigenous Knowledge, and Community Knowledge	Vol. 3, s. 4.1.1 Inuit Knowledge, pp. 4-1–4-3; s. 4.2 Managing Confidential Information, pp. 4-4–4-5; Vol. 1 Appendix A, s. 10 concordance, pp. A-188–A-190.	The IS states that the NTKP information was used under a licensing agreement with KIA and that consent and confidentiality were considered. However, the documentation is not presented as a consolidated compliance table for all Inuit, Indigenous, and Community Knowledge sources. It is therefore difficult to confirm whether each knowledge source had specific protocols, consent limits, verification requirements, ownership limits, or disclosure restrictions.	The IS does not provide a complete protocol-and-consent compliance record for each knowledge source, including Indigenous groups outside Nunavut and communities contributing through engagement or community-based research.	Provide a protocol-and-consent compliance table for Section 10.1 that identifies: 1. each knowledge source or study; 2. owner or responsible organization; 3. applicable protocol, agreement, consent form, or disclosure limit; 4. whether free, prior, and informed consent was obtained; 5. conditions on analysis, validation, storage, disclosure, and use; 6. whether the IS complies with those conditions; and 7. any information that could not be used or disclosed because of protocol limits.

IR Source	IR #	IR Directed To	Subject	IS Reference Reviewed	Reviewer Comments / Reasoning	Missing Information / Gap	Information Requests / IR
NIRB	399.	West Kitikmeot Resources Corp.	Methods for Gathering Inuit Qaujimaningit, Indigenous Knowledge, and Community Knowledge	Vol. 3, s. 4.1.1 Inuit Knowledge, pp. 4-1–4-3; s. 5.1–5.4, pp. 5-1–5-8; Vol. 2, s. 2.1.5 Public Engagement and Inuit Qaujimajatuqangit, pp. 2-7–2-8.	The IS identifies the Project-specific Kitikmiut Knowledge report compiled from the NTKP as the primary source of verified Inuit Knowledge and acknowledges engagement beginning in 2016, with WKR’s 2024–2025 engagement program. The IS does not clearly show a source-by-source limitations review for older or previously collected information, including whether affected groups confirmed that the information remains current and applicable to the present Project design and assessment boundaries.	The age, geographic fit, current relevance, and limitations of previously documented knowledge are not summarized in a way that allows reviewers to evaluate whether those sources are sufficient for current conditions and Project-specific effects.	Provide a previously-documented-knowledge relevance assessment that includes: 1. source date and original purpose; 2. geographic coverage; 3. communities or groups represented; 4. current relevance to the Project footprint, LAA and RAA; 5. known changes since collection; 6. limitations identified by affected groups or KIA; 7. confirmation/validation completed for current use; and 8. how limitations were addressed in baseline, effects, mitigation, monitoring, and significance determinations.
NIRB	400.	West Kitikmeot Resources Corp.	Methods for Gathering Inuit Qaujimaningit, Indigenous Knowledge, and Community Knowledge	Vol. 3, s. 4.1, pp. 4-1–4-4; s. 6.1.1 Overview of Engaged Parties, pp. 6-2–6-5; Appendix 6A IAG Workshop Summaries; Appendix 6C Community-based Research.	The IS describes engagement streams, IAG workshops, interviews, and participating communities/organizations. It does not fully describe the design of each knowledge-sharing study, sampling rationale, participant selection, facilitation methods, analytical responsibilities, or validation responsibilities in one place. This makes it difficult to determine whether the right knowledge holders were engaged for each topic and whether participation was sufficient for the conclusions drawn.	Study design, participant selection rationale, facilitation protocols, analytical responsibilities, and validation responsibilities are dispersed or incomplete.	Provide a knowledge-study design table that includes: 1. study or engagement activity; 2. topic and purpose; 3. participant categories and selection rationale; 4. communities and organizations involved; 5. facilitation and language methods; 6. recording/documentation method; 7. analysis responsibilities; 8. validation responsibilities; 9. confidentiality controls; and 10. how the study informed specific IS sections.

IR Source	IR #	IR Directed To	Subject	IS Reference Reviewed	Reviewer Comments / Reasoning	Missing Information / Gap	Information Requests / IR
NIRB	401.	West Kitikmeot Resources Corp.	Methods for Gathering Inuit Qaujimaningit, Indigenous Knowledge, and Community Knowledge	Vol. 3, s. 4.1.1, pp. 4-1–4-3; s. 4.2, pp. 4-4–4-5; s. 4.3, p. 4-5; s. 5.5 Reconciling Perspectives, p. 5-9.	The IS states that NTKP information is verified through KIA protocols and that some engagement information was reviewed and incorporated. However, it does not provide a clear validation record showing which summaries, interpretations, maps, conclusions, or VC-specific uses of knowledge were returned to Knowledge holders or representative groups for review before inclusion in the IS.	There is no consolidated validation log showing what was verified, by whom, when, and whether Knowledge holders agreed with the Proponent’s interpretation and use of the information.	Provide a validation log for Section 10.1 that includes: 1. material verified; 2. Knowledge holder/community/group reviewer; 3. date and method of validation; 4. comments received; 5. revisions made; 6. unresolved concerns; 7. material not validated and rationale; and 8. confirmation that validation occurred before public/NIRB filing wherever feasible.
NIRB	402.	West Kitikmeot Resources Corp.	Methods for Gathering Inuit Qaujimaningit, Indigenous Knowledge, and Community Knowledge	Vol. 3, s. 4.2 Managing Confidential Information, pp. 4-4–4-5; s. 4.3 Details and Outcomes, p. 4-5; Vol. 11 management-plan framework for ongoing engagement and monitoring.	The IS discusses confidentiality and ownership at a general level, including the proprietary nature of knowledge. It does not provide a detailed repatriation, long-term storage, access, retention, update, or data-governance protocol acceptable to impacted Inuit communities and other knowledge owners.	Long-term knowledge stewardship is not described in sufficient detail to confirm how knowledge will be stored, protected, returned, updated, accessed, or used during operations, monitoring, care and maintenance, closure, and post-closure.	Provide a data-governance and knowledge-stewardship protocol that includes: 1. ownership by source; 2. storage location and custodian; 3. access permissions; 4. retention period; 5. repatriation process; 6. update/correction procedures; 7. restrictions on secondary use; 8. long-term use in monitoring and management; and 9. confirmation of acceptance by KIA and, where applicable, other knowledge-owning organizations.
NIRB	403.	West Kitikmeot Resources Corp.	Details and Outcomes	Vol. 3, s. 6.1.1 Overview of Engaged Parties, pp. 6-2–6-5; Table 6.1 Engagement Activities, p. 6-11; Table 6.2 Summary of Key Issues, pp. 6-12–6-15; Appendices 6A–6E.	Volume 3 identifies communities, organizations, workshops, interviews, historical engagement, current engagement, and key issues raised. However, the information is not consolidated as a knowledge-study register that distinguishes Inuit Knowledge, Indigenous Knowledge, and Community Knowledge sources, participant categories, validation status, and where each input is used in the IS.	Reviewers cannot easily verify whether all required details are available for each knowledge study or engagement source, or how each study connects to the IS conclusions.	Provide a consolidated Section 10.2 knowledge-study register with: 1. study/activity name; 2. community or organization; 3. participant categories; 4. date, location, and format; 5. topic and key dialogue; 6. information/knowledge shared; 7. issues/comments raised; 8. validation status; 9. confidentiality status; and 10. IS sections, VCs, mitigation, or monitoring measures informed.

IR Source	IR #	IR Directed To	Subject	IS Reference Reviewed	Reviewer Comments / Reasoning	Missing Information / Gap	Information Requests / IR
NIRB	404.	West Kitikmeot Resources Corp.	Details and Outcomes	Vol. 3, s. 6.1.1 Overview of Engaged Parties, pp. 6-2–6-5; Appendix 6A IAG Workshop Summaries; Appendix 6C Community-based Research; Vol. 3, s. 4.1 and s. 5.	The IS identifies IAG members, community-based interviews, HTOs/HTAs, Hamlets, and community engagement. It does not clearly summarize participation by Elders, women, youth, marginalized groups, harvesters, or other land/marine users for each knowledge-gathering activity, nor whether any groups were underrepresented or required additional engagement.	The completeness and representativeness of knowledge gathering cannot be fully assessed because participant categories and targeted outreach outcomes are not summarized consistently.	Provide a participation and representativeness summary that includes: 1. participant categories by activity; 2. specific efforts to engage Elders, women, youth, marginalized groups, and harvesters; 3. whether participants were familiar with the PDA, LAA, and RAA; 4. gaps or underrepresented groups; 5. follow-up actions to fill gaps; and 6. how participation limitations affect confidence in baseline and effects conclusions.
NIRB	405.	West Kitikmeot Resources Corp.	Details and Outcomes	Vol. 3, Table 6.2 Summary of Key Issues Raised During Engagement, pp. 6-12–6-15; s. 6.3.4 Response to Community Feedback, pp. 6-15–6-16; s. 6.3.5 Ongoing and Future Engagement Activities, p. 6-16.	The IS summarizes major concerns and describes general responses, including continued engagement and future involvement in monitoring and management plans. The response record does not always identify the originating knowledge source, the specific decision or mitigation change made, unresolved issues, or the follow-up schedule for each concern.	Concerns are not converted into a detailed action and follow-up register with responsibility, schedule, response status, and links to design, mitigation, monitoring, or unresolved disagreements.	Provide a Section 10.2 concern-response-follow-up register that includes: 1. issue or knowledge-based concern; 2. source community/group; 3. date raised; 4. Proponent response; 5. design/assessment/mitigation/monitoring change made; 6. unresolved concern or disagreement; 7. follow-up commitment; 8. responsible party; and 9. schedule for reporting back to Knowledge holders.
NIRB	406.	West Kitikmeot Resources Corp.	Details and Outcomes	Vol. 3, s. 4.3 Details and Outcomes, p. 4-5; s. 5.4 Integration into Engagement Methods and the Assessment, pp. 5-3–5-8; s. 5.4.1–5.4.7; Vol. 4, s. 9.2.3, p. 9-4; VC sections in Vols. 5–10.	The IS states that knowledge informed project planning, baseline understanding, effects pathways, mitigation, cumulative effects, significance, monitoring, management plans, and design. However, the connection is typically described at a narrative level and uses examples rather than a complete traceable matrix showing how knowledge altered specific design choices, baseline assumptions, effect pathways, mitigation, monitoring, or final conclusions.	The IS does not provide an auditable knowledge-to-decision traceability matrix across all VCs and project phases.	Provide a knowledge-to-decision matrix that identifies for each VC and project phase: 1. knowledge input or concern; 2. source and validation status; 3. affected project component or assessment topic; 4. design decision, baseline assumption, effects pathway, mitigation, monitoring measure, or significance conclusion affected; 5. whether the input changed the assessment; 6. rationale if it did not change the assessment; and 7. remaining uncertainty or disagreement.

IR Source	IR #	IR Directed To	Subject	IS Reference Reviewed	Reviewer Comments / Reasoning	Missing Information / Gap	Information Requests / IR
NIRB	407.	West Kitikmeot Resources Corp.	Details and Outcomes	Vol. 3, s. 5.5 Reconciling Perspectives, p. 5-9; Table 6.2 Summary of Key Issues, pp. 6-12–6-15; Vol. 10 holistic and transboundary assessments.	Volume 3 acknowledges that Inuit, Indigenous, and Community Knowledge may differ from western scientific frameworks and that WKR sought to reconcile perspectives. However, it does not provide a comprehensive register of specific differences between knowledge sources or between knowledge and scientific conclusions, nor the rationale for how each difference was resolved or carried into precautionary mitigation and monitoring.	This is a material Section 10.2 gap because the Guidelines require identification and rationale for differences, further engagement, committed reconciliation measures, and monitoring where differences remain.	Provide a differences-and-reconciliation register that includes: 1. VC or topic; 2. knowledge-based conclusion; 3. scientific or Proponent conclusion; 4. nature of the difference; 5. parties involved; 6. engagement undertaken to reconcile the difference; 7. rationale for final assessment treatment; 8. precautionary measures adopted; 9. monitoring commitments where disagreement remains; and 10. how the difference affects significance and confidence.
NIRB	408.	West Kitikmeot Resources Corp.	Details and Outcomes	Vol. 3, s. 4.3 Details and Outcomes, p. 4-5; s. 5.1–5.5, pp. 5-1–5-9; Appendices 6A–6E.	The IS includes summarized themes and examples, but it often presents knowledge in synthesized Proponent language rather than clearly distinguishing the conclusions expressed by Knowledge holders from the Proponent’s interpretation and final assessment conclusion. Verification before inclusion is also not documented consistently for each knowledge-related conclusion.	The record does not consistently show Knowledge-holder conclusions in their own terms, the Proponent’s interpretation, validation status, and how final wording was confirmed.	Provide a knowledge-conclusions verification table that includes: 1. conclusion as expressed by Knowledge holders, respecting confidentiality; 2. Proponent interpretation; 3. IS section where used; 4. verification method and date; 5. reviewer/community/group involved; 6. changes made after verification; 7. remaining concerns; and 8. how verified conclusions inform mitigation, monitoring, and significance.
NIRB	409.	West Kitikmeot Resources Corp.	Managing Confidential Information	Vol. 3, s. 4.2 Managing Confidential Information, pp. 4-4–4-5; s. 4.3 Details and Outcomes, p. 4-5; Vol. 1 Appendix A, s. 10 concordance, pp. A-188–A-190.	The IS recognizes that knowledge is proprietary and may be confidential, and states that sensitive knowledge can be generalized. However, the IS does not provide a clear protocol showing how confidential information was protected while still providing enough evidence for NIRB and technical reviewers to understand how it influenced design, effects assessment, mitigation, monitoring, and conclusions.	There is insufficient reviewer-facing documentation on how confidential information was generalized, protected, cited, and used in assessment decisions without disclosing sensitive details.	Provide a confidential-information management protocol that includes: 1. categories of confidential knowledge; 2. treatment of sensitive sites, harvesting areas, and cultural information; 3. generalization methods; 4. reviewer-facing evidence summaries; 5. access restrictions; 6. roles and responsibilities; 7. quality control to prevent inappropriate disclosure; and 8. examples showing how confidential knowledge changed the IS without disclosing sensitive details.

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NIRB	410.	West Kitikmeot Resources Corp.	Managing Confidential Information	Vol. 3, s. 4.2 Managing Confidential Information, pp. 4-4–4-5; Appendix 6A IAG Workshop Summaries; Appendix 6C Community-based Research.	The IS discusses consent and confidentiality generally but does not provide a complete storage/sharing protocol, nor does it identify whether any confidential information has been or will be filed confidentially with NIRB to support decision-making while protecting sensitive information.	Data storage, sharing controls, confidential filing decisions, and permissions are not documented with enough detail for review.	Provide a confidential storage and sharing plan that includes: 1. knowledge datasets held by WKR or others; 2. storage location and custodian; 3. permission basis for use; 4. who can access the information; 5. how information will be shared with NIRB, KIA, communities, and regulators; 6. whether confidential NIRB filings are required; 7. process for Knowledge holder approval before disclosure; and 8. long-term retention or return/repatriation arrangements.
NIRB	411.	West Kitikmeot Resources Corp.	Managing Confidential Information	Vol. 3, s. 4.1–4.2, pp. 4-1–4-5; Vol. 3, s. 5, pp. 5-1–5-9; Vol. 1 Appendix A, s. 10 concordance, pp. A-188–A-190.	The IS identifies broad sources such as NTKP, Banci and Spicker 2024, IAG workshops, engagement feedback, publicly available literature, and community-based research. However, it does not provide a source-attribution matrix that clearly distinguishes information ownership, confidentiality restrictions, validation status, and where each source is used in the IS.	Ownership and confidentiality-aware source attribution is not sufficiently transparent across all knowledge sources and VC uses.	Provide a source-attribution and ownership matrix that includes: 1. knowledge source; 2. owner or custodian; 3. confidentiality status; 4. consent status; 5. validation status; 6. citation or reference method used in public IS text; 7. IS sections using the source; and 8. restrictions on further disclosure or use.
NIRB	412.	West Kitikmeot Resources Corp.	Environmental Management Plan	Vol. 11, ss. 37.1–37.1.3, pp. 37-1–37-3; Vol. 11, s. 37.1.8, p. 37-9; Vol. 2, project life and operations description.	Volume 11 presents an EMS framework, lists management and monitoring plans, and states that plans support Construction and Operations and Maintenance. It also states operations and maintenance will continue in perpetuity, while Section 37.1.8 indicates no conceptual closure and reclamation plan is proposed for permanent infrastructure.	The EMS does not clearly address the full project life as required by the Guidelines because permanent infrastructure, temporary closure, final closure, post-closure, and long-term stewardship are not treated as fully developed phases. The environmental policy and operational control framework are described generally rather than as a complete, auditable management system.	Provide an Environmental Management Plan addendum that includes: 1. WKR’s environmental policy; 2. a full life-of-project phase applicability matrix covering pre-construction, construction, operations, maintenance, reduced operations, modifications, temporary closure, final closure/decommissioning, reclamation, post-closure, and long-term stewardship; 3. plan ownership and accountability for each phase; 4. operational procedures that implement each commitment; and 5. a rationale for any phase or component excluded from EMS coverage.

IR Source	IR #	IR Directed To	Subject	IS Reference Reviewed	Reviewer Comments / Reasoning	Missing Information / Gap	Information Requests / IR
NIRB	413.	West Kitikmeot Resources Corp.	Environmental Management Plan	Vol. 11, s. 37.1.5, p. 37-6; Vol. 11, s. 37.1.6, p. 37-6; Appendix 37C, 37D, 37E, 37F, 37G, 37H and attachments with NTD placeholders.	Volume 11 states that plans will be updated before the technical meeting/pre-hearing conference, after the pre-hearing conference report and before the final hearing, and after the final hearing if necessary. It also states plans will be refined as project design advances and additional information becomes available.	The update schedule is not tied to specific missing information, responsible parties, or regulatory decision points. Many NTD placeholders are not accompanied by a firm date or commitment to file information before technical review closes.	Provide a management-plan completion schedule that lists: 1. each draft plan and attachment; 2. every NTD/TBD/missing section; 3. information needed to complete it; 4. dependency on design, permits, baseline studies, engagement, or agency review; 5. responsible party; 6. submission date; 7. whether it will be filed before the technical meeting, before the final hearing, before construction, or during licensing; and 8. which IS residual-effects conclusions rely on the missing information.
NIRB	414.	West Kitikmeot Resources Corp.	Monitoring and Mitigation Plans	Vol. 11, Tables 37.1 and 37.2; Appendix 37B WMMP, Appendix 37C AQMMP, Appendix 37D AEMP, Appendix 37G HRMP, Appendix 37K SEMP.	Several plans include objectives, legal context, roles, and monitoring concepts. However, the level of detail varies substantially across plans, and some monitoring programs explicitly state that locations, frequency, study design, and thresholds will be developed later.	The submission does not provide a consistent minimum standard across all monitoring plans. For example, AEMP and noise/vibration details are largely deferred, and socio-economic monitoring indicators and thresholds are not fully specified.	For each monitoring and mitigation plan, provide a standardized plan-content checklist showing where the IS provides: 1. objectives; 2. laws/regulations; 3. VCs/receptors; 4. indicators/parameters; 5. controls/reference sites; 6. selection criteria; 7. frequency; 8. duration; 9. geographic extent; 10. personnel/qualifications; 11. data analysis method; and 12. interpretation/reporting responsibility. Fill all missing items or provide a justified schedule for filing them before technical review closes.
NIRB	415.	West Kitikmeot Resources Corp.	Follow-Up and Adaptive Management Plans	Vol. 11, s. 37.1.5, pp. 37-5–37-6; Appendix 37B WMMP; Appendix 37D AEMP; Appendix 37K SEMP; Vols. 5–9 prediction confidence and follow-up sections.	Volume 11 provides a general adaptive management approach and states that follow-up programs will be described where necessary to verify effects predictions or mitigation effectiveness.	The IS does not provide a consolidated field-testable follow-up program that converts predictions and assumptions into testable objectives. It also does not provide the statistical evaluation required to determine whether baseline data are adequate or whether additional pre-construction/pre-operational monitoring is needed.	Provide a Follow-Up and Adaptive Management Plan that includes: 1. each key effects prediction; 2. underlying assumptions; 3. mitigation measure to be tested; 4. field-testable monitoring objective; 5. sampling design; 6. baseline adequacy/statistical power assessment; 7. additional baseline monitoring required before construction or operation; 8. decision criteria; 9. adaptive response; and 10. reporting timeline.

IR Source	IR #	IR Directed To	Subject	IS Reference Reviewed	Reviewer Comments / Reasoning	Missing Information / Gap	Information Requests / IR
NIRB	416.	West Kitikmeot Resources Corp.	Closure and Reclamation Plan	Vol. 11, s. 37.1.8, p. 37-9; Appendix 37F Progressive Reclamation Plan (Draft); Vol. 1 Appendix A closure concordance; Vol. 2 permanent infrastructure description.	Volume 11 states the Project is largely composed of permanent infrastructure and WKR has not proposed a conceptual closure and reclamation plan for those components. A Progressive Reclamation Plan is provided for temporary facilities that will be reclaimed after initial construction or when not required during operations.	This does not meet the Guideline requirement for a preliminary Closure and Reclamation Plan for all components. Permanent road, port, aerodrome, tank farm, marine infrastructure, quarries retained for operations, and utilities require closure/decommissioning or long-term stewardship scenarios even if intended as permanent infrastructure.	Provide a preliminary Closure and Reclamation Plan or long-term stewardship plan for all Project components, including permanent infrastructure. The plan must include: 1. closure scenarios for continued use, transfer, abandonment, partial decommissioning, and full decommissioning; 2. component-specific closure objectives; 3. design-for-closure considerations; 4. decommissioning methods; 5. reclamation methods; 6. long-term inspection and maintenance; 7. residual liabilities; and 8. funding/security approach.
NIRB	417.	West Kitikmeot Resources Corp.	Closure and Reclamation Plan	Appendix 37F Progressive Reclamation Plan (Draft), ss. 1–7; Vol. 11, s. 37.1.8, p. 37-9; Appendix 37H Attachment H1 Borrow Pit and Quarry Management Plan draft NTD sections.	The Progressive Reclamation Plan provides a framework for temporary areas and states that reclamation methods, ARD/ML considerations, monitoring methodology, criteria, and costs will be developed or updated. The Borrow Pit and Quarry Management Plan also contain NTD sections for geotechnical investigations, ARD/ML testing, metal leaching testing, and closure details.	The reclamation plan does not provide sufficient component-specific goals, methods, timeframes, criteria, monitoring, costs, or ARD/ML management for technical review. It also does not address how the land would return to similar pre-project use for all affected areas or how community-defined end land use and aesthetics were incorporated.	Provide a complete preliminary reclamation content table for each component and disturbance type that includes: 1. closure/reclamation objective; 2. end land-use objective; 3. community input received; 4. design-for-closure measure; 5. reclamation method; 6. schedule and progressive reclamation trigger; 7. ARD/ML and geochemical criteria; 8. monitoring parameter; 9. success criterion; 10. contingency action; 11. cost estimate/security basis; and 12. public health, safety, and aesthetics considerations.
NIRB	418.	West Kitikmeot Resources Corp.	Care and Maintenance Plan	Vol. 11, s. 37.1.8.1, p. 37-9; Vol. 11, Road and Port Management Plan summaries, pp. 37-6–37-7; Appendix 37A Road Management Plan; Appendix 37I Port Management Plan.	Volume 11 states that care and maintenance measures will be developed and that these measures are included in the Road Management Plan and Port Management Plan as appropriate. The road and port summaries state that care and maintenance measures are included for temporary or unplanned closures or reduced operations.	The IS does not provide a standalone or integrated preliminary Care and Maintenance Plan. Required details are missing for staffing, inspections, environmental protection, fuel/waste/water management, public access, wildlife protection, emergency response, security, reporting, and transition criteria during reduced or suspended operations.	Provide a preliminary Care and Maintenance Plan that includes: 1. triggers for temporary closure, unplanned closure, reduced operations, partial closure, pandemic, labour disruption, and ownership/operating changes; 2. minimum staffing and site security; 3. inspection and maintenance schedules; 4. fuel, hazardous materials, waste, water, wastewater, and explosives controls; 5. road/port/aerodrome access controls; 6. wildlife and caribou protections; 7. emergency response capacity; 8. community/regulator notification; 9. environmental monitoring; and 10. criteria to return to normal operation or initiate closure/reclamation.

IR Source	IR #	IR Directed To	Subject	IS Reference Reviewed	Reviewer Comments / Reasoning	Missing Information / Gap	Information Requests / IR
NIRB	419.	West Kitikmeot Resources Corp.	Significance of Residual Impacts	Vol. 1 Main Document residual effects summaries; Vols. 5–10 VC and additional assessments; Vol. 11 management-plan reliance; Vol. 9 examples where positive residual effects are not characterized further.	The IS includes residual effects and significance determinations in VC volumes and summaries in the Main Document. The assessment generally concludes residual effects are not significant after mitigation, with several conclusions relying on management plans and monitoring.	There is no single Section 11-style consolidated table showing pre-mitigation effects, mitigation applied, post-mitigation residual impacts, unmitigated/uncompensated impacts, significance criteria, and plan dependencies across all VCs. Positive residual socio-economic effects are also not consistently characterized using the same criteria.	Provide a consolidated residual-impact and mitigation dependency table that includes: 1. VC/receptor; 2. project activity; 3. pre-mitigation effect; 4. mitigation/enhancement measure; 5. management plan implementing the measure; 6. residual effect after mitigation; 7. whether the effect can be fully mitigated, partially mitigated, compensated, or not mitigated; 8. significance criteria under s. 7.4.6; 9. uncertainty/confidence; 10. monitoring/follow-up; and 11. characterization of both positive and adverse residual effects.
NIRB	420.	West Kitikmeot Resources Corp.	Inclusion of sufficient information to support assessment of impacts and mitigation - Air Quality Management Plan	Volume 11, Appendix 37C	The draft Air Quality Management Plan appears to lack information on methodology, sampling locations, schedule, and in some cases equipment that would be used. Monitoring plans can't be developed based on a case-by-case basis should any complaints arise from Kitikmiut, other Indigenous groups, and other potentially affected communities because of project activities. The absence of mitigation and monitoring information limits reviewers' ability to assess the effectiveness of proposed measures and evaluate the significance of residual effects over the life of the Project. While additional detail may be developed during licensing, the Draft Impact Statement should contain sufficient information to support NIRB's assessment of project effects throughout all phases of the Project.	1. The Draft AQMP does not provide complete mitigation, monitoring, and adaptive management measures for each Project phase. 2. Reference and potentially affected monitoring locations within the PDA, LAA, and RAA have not been identified. 3. Monitoring methods, equipment, site-selection criteria, and schedules have not been clearly described. 4. Thresholds, triggers, mitigation responses, and adaptive management actions have not been adequately defined. 5. Deferring key AQMP details to future plans or licensing stages limits the ability to assess potential effects, mitigation effectiveness, and residual effects.	Provide an updated Draft AQMP that includes mitigation, monitoring, and adaptive management measures applicable to each phase of the Project. At a minimum, the updated Plan should: a) Include information on where stations would be installed along the PDA, LAA and RAA to monitor reference stations as well as potential areas that may be impacted by the proposed project. b) Include methodology, equipment to be used, locations of sites, schedule, and adaptive management and mitigation measures. The Draft AQMP should provide sufficient information to support the assessment of potential effects and mitigation effectiveness during construction and operations. Deferral of mitigation and monitoring details to future plans or licensing stages limits the ability of NIRB and reviewers to evaluate residual effects and determine whether proposed mitigation is adequate

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NIRB	421.	West Kitikmeot Resources Corp.	Inclusion of sufficient information to support assessment of impacts and mitigation - Aquatic Effects Management Plan	Volume 11, Appendix 37D	The Aquatic Effects Management Plan (AEM) provides examples of monitoring programs for both freshwater and marine waters to be completed during the construction and during the operations and maintenance phase of the Project with no detailed monitoring programs provided. It is requested that the Proponent develop draft monitoring programs for each VC identified so that the reader can evaluate the effectiveness of mitigation measures and any associated follow-up mechanisms proposed that support adaptive management of the Project effects and cumulative effects. In addition, reporting of these programs should be included for both the freshwater and marine environments. As noted, the absence of mitigation and monitoring information limits reviewers' ability to assess the effectiveness of proposed measures and evaluate the significance of residual effects over the life of the Project. While additional detail may be developed during licensing, the Draft Impact Statement should contain sufficient information to support NIRB's assessment of project effects throughout all phases of the Project.	1. The Draft AEMP does not provide complete mitigation, monitoring, and adaptive management measures for each Project phase. 2. Monitoring methods, locations, parameters, schedules, thresholds, and triggers have not been clearly defined. 3. Adaptive management actions and mitigation responses have not been adequately described. 4. Deferring key AEMP details to future plans or licensing stages limits the ability to assess potential effects, mitigation effectiveness, and residual effects during construction and operations.	Provide an updated AEMP that includes mitigation, monitoring, and adaptive management measures applicable to each phase of the Project. The Draft AEMP should provide sufficient information to support the assessment of potential effects and mitigation effectiveness during construction and operations. Deferral of mitigation and monitoring details to future plans or licensing stages limits the ability of NIRB and reviewers to evaluate residual effects and determine whether proposed mitigation is adequate.

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NIRB	422.	West Kitikmeot Resources Corp.	Inclusion of sufficient information to support assessment of impacts and mitigation - Progressive Reclamation Plan	Volume 11, Appendix 37F	A more detailed draft Progressive Reclamation Plan should be included as part of the draft IS for areas that would be disturbed during the Construction Phase and no longer required for the Operation Phase of the proposed Project. The draft reclamation plan is necessary because: 1) Closure and reclamation influence the significance of long-term environmental and socio-economic effects. 2) Progressive reclamation is itself a mitigation measure and should be assessed as part of the Project. 3) Regulators, Inuit organizations, communities, and NIRB need sufficient information to determine whether residual effects are acceptable. 4) Waiting until detailed licensing stages would prevent meaningful assessment of closure outcomes and financial liabilities.	1. A draft Progressive Reclamation Plan has not been provided. 2. Closure objectives and proposed end land uses have not been clearly defined. 3. A progressive reclamation philosophy, including commitments to reclaim areas once they are no longer required, has not been described. 4. Principles and measures for minimizing the disturbed Project footprint have not been clearly identified. 5. Areas that could be progressively reclaimed during construction and operations have not been identified. 6. Conceptual reclamation methods, including stabilization, material replacement, revegetation, drainage restoration, monitoring, and adaptive management, have not been adequately described.	Provide a draft Progressive Reclamation Plan that include closure objectives and end land use, progressive reclamation philosophy that includes commitment to reclaim areas no longer needed for construction/operations and principles for minimizing the disturbed footprint, identification of reclaimable areas, and conceptual reclamation methods.

NIRB	423.	West Kitikmeot Resources Corp.	Inclusion of sufficient information to support assessment of impacts and mitigation - Environmental Protection Plan	Volume 11, Appendix 37H	The Draft Environmental Protection Plan (EPP) does not appear to contain sufficient information to support the environmental impact assessment or to allow reviewers to adequately evaluate the effectiveness of the proposed mitigation measures. Throughout the document, numerous sections contain statements such as "to be updated as plans progress" or similar commitments to provide information at a later stage. These statements indicate that key environmental management and mitigation details have been deferred rather than provided as part of the Draft IS. As a result, reviewers are unable to assess the specific measures that would be implemented to avoid, minimize, manage, monitor, and respond to potential environmental effects associated with Project construction, operation, maintenance, and potential temporary closure activities. The Draft IS relies on the EPP as a primary mechanism for mitigating environmental effects; however, the absence of detailed mitigation measures, implementation procedures, monitoring requirements, performance objectives, and adaptive management responses introduces uncertainty regarding the effectiveness of the proposed environmental protection framework and the conclusions of the effects assessment. This concern applies to several key Project components and activities, including but not limited to project planning, site access and transportation, site	1. The Draft Environmental Protection Plan lacks sufficient Project-specific detail to evaluate mitigation effectiveness, feasibility, and implementation. 2. Environmental risks, mitigation measures, performance criteria, monitoring, reporting, and adaptive management have not been clearly identified for each Project activity and component. 3. Information deferred to future planning stages, including its scope, rationale, timing, and effect on assessment certainty, has not been clearly documented. 4. Detailed mitigation and monitoring measures for access, earthworks, storage, fuel, power generation, blasting, erosion, spills, waste, water use, and watercourse crossings have not been adequately provided. 5. The basis for assuming that incomplete or unfinalized mitigation measures will be effective has not been clearly explained. 6. Uncertainty associated with relying on future plan development has not been adequately incorporated into residual effects and significance conclusions. 7. It is unclear whether residual effects	The Draft Environmental Protection Plan contains numerous references to information that will be developed or updated in the future and does not provide sufficient detail to support review of the proposed environmental management and mitigation framework. It is recommended the Proponent provide: a) An updated Environmental Protection Plan that includes sufficient Project-specific information to support assessment of the effectiveness, feasibility, and implementation of proposed mitigation measures. b) For each Project activity and component, including the Grays Bay Road corridor, port facilities, Jericho facilities and station area, borrow sources, camps, laydown areas, and associated infrastructure, provide: i) the environmental risks and potential effects identified; ii) the mitigation measures that will be implemented; iii) performance objectives and criteria; iv) monitoring and inspection requirements; v) reporting procedures; and vi) adaptive management and contingency measures. c) A description of all information currently identified as "to be updated as plans progress" or otherwise deferred to future planning stages, including: i) the specific information that remains outstanding; ii) the rationale for not providing the information in the Draft IS; iii) when the information will be available; and iv) how the absence of the information affects the certainty of the effects assessment. d) Detailed mitigation and monitoring measures related to: i) site access and transportation; ii) site preparation and earthworks; iii) material and equipment storage; iv) fuel handling and storage; v) power generation and utilities; vi) blasting activities; vii) erosion and sediment control; viii) spill prevention and response; ix) waste management; x) water withdrawal and use; and xi) watercourse crossings. e) An explanation of how the effectiveness of mitigation measures was evaluated and incorporated into the effects assessment where detailed mitigation measures have not yet been finalized. f) A discussion of the uncertainty associated with relying on future plan development to address currently undefined mitigation measures and how this uncertainty was considered in residual effects predictions and significance determinations. g) Confirmation of whether any residual effects conclusions presented in the Draft IS could change following completion of the outstanding environmental management and mitigation planning. If not, provide justification.
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					preparation and earthworks, material and equipment storage, fuel handling and storage, power generation and utilities, blasting, erosion and sediment control, spill prevention and response, waste management, water withdrawal and use, and watercourse crossings. In many cases, the Draft EPP does not provide sufficient information regarding mitigation measures, monitoring programs, performance criteria, responsibilities, or contingency actions. In addition, the Draft EPP provides limited Project-specific information regarding major Project components, including the Grays Bay Road corridor, the Jericho facilities and station area, the port site, and associated infrastructure. Consequently, it is difficult to determine how environmental protection measures would be applied across the various Project components and whether the proposed measures are appropriate given the environmental sensitivities and potential effects associated with each area. Without a more complete EPP, reviewers cannot adequately evaluate whether the proposed mitigation measures are technically feasible, sufficiently protective, or capable of supporting the residual effects conclusions presented in the Draft IS.	conclusions could change once the outstanding environmental management and mitigation plans are completed.	

NIRB	424.	West Kitikmeot Resources Corp.	Inclusion of sufficient information to support assessment of impacts and mitigation - Borrow Pit and Quarry Management Plan	Volume 11, Appendix 37H, Attachment H1	The draft Borrow Pit and Quarry Management Plan (BPQM) provides insufficient detail for a Draft IS particularly as this document is intended to support NIRB's impact assessment. Many sections of the Plan contain repeated statements of "Update section..." which suggest that the Proponent has deferred key information to a future stage rather than providing information sufficient for NIRB to assess effects now. For example, under Section 2.2: Geotechnical Investigation, a Draft IS should not simply state that the section will be updated, it should present: existing geotechnical investigations completed to date; permafrost conditions; slope stability considerations; foundation characteristics; limitations and uncertainties; and how these results influenced quarry and borrow pit selection. Another example is Section 2.3: ARD/ML potential, if borrow pits and quarries are proposed, the Draft IS should include: geochemical characterization completed to date; number and location of samples; static test results; preliminary ARD and metal leaching predictions; identification of uncertainties and additional testing requirements. Simply saying that testing will be completed later does not allow reviewers to determine whether excavated material may generate acidic drainage or release metals. Further, for the mitigation and monitoring (2.3.3), saying "Update this section on mitigation and monitoring if necessary, after confirmation	1. Results of geotechnical and geochemical investigations completed to date have not been adequately presented. 2. Acid rock drainage and metal leaching potential from borrow pits and quarries has not been clearly assessed. 3. Preliminary impact predictions, mitigation measures, and monitoring requirements have not been sufficiently described. 4. Remaining uncertainties and planned confirmation testing have not been clearly identified. 5. A detailed draft Borrow Pit and Quarry Management Plan has not been provided. 6. Deferring key information to future investigations limits the ability to assess mitigation effectiveness and residual effects before the Final IS and hearings.	The Draft IS should present the results of geotechnical and geochemical investigations completed to date and provide sufficient information regarding acid rock drainage and metal leaching potential, as well as proposed mitigation and monitoring measures, to enable assessment of potential effects associated with borrow pits and quarries. Statements indicating that these sections will be updated following future investigations do not provide sufficient information for NIRB and reviewers to evaluate the effectiveness of mitigation or characterize residual effects. Any remaining uncertainties and planned confirmation testing should be clearly identified, but should not replace the provision of preliminary impact predictions and mitigation measures. The Proponent should provide a draft Borrow Pit and Quarry Management Plan that provides sufficient detail to allow the Board and intervenors to evaluate the project before moving to Final IS and hearings. A Draft IS should contain preliminary assessments and proposed mitigation, not placeholders.
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					testing is complete" is problematic as it tells reviewers that the Proponent will determine whether mitigation is necessary later. But mitigation measures are part of the project description and are needed to assess residual effects. A Draft IS should contain: preliminary mitigation measures; trigger values and adaptive management framework; proposed water quality monitoring; material segregation procedures (if needed); contingency measures; and closure and reclamation considerations.		
NIRB	425.	West Kitikmeot Resources Corp.	Inclusion of sufficient information to support assessment of impacts and mitigation - Management Plans within the Environmental Protection Plan	Volume 11, Appendix 37H, Attachment H2 through H7	As the Environmental Protection Plan (Appendix 37H) do not provide sufficient detail for a Draft IS particularly as these documents are intended to support NIRB's impact assessment. Many sections of the plans contain repeated statements of "Update section..." which suggest that the Proponent has deferred key information to a future stage rather than providing information sufficient for NIRB to assess effects now.	1. Updated draft plans with sufficient Project-specific detail have not been provided. 2. The plans rely on placeholders or information deferred to future stages. 3. Preliminary assessments, mitigation measures, monitoring requirements, and adaptive management actions have not been adequately described. 4. The lack of complete draft plans limits the ability of NIRB and intervenors to evaluate the proposed Project.	The Proponent should provide updates draft Plans with sufficient information that contain preliminary assessments and proposed mitigation to allow the NIRB and intervenors to evaluate the proposed Project, not placeholders.

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NIRB	426.	West Kitikmeot Resources Corp.	Inclusion of sufficient information to support assessment of impacts and mitigation	Volume 11, Appendix 37I, 37J and 37K	As with the other management plans, the Port Management Plan, the Inuit Human Resources and Business Development Plan, and Socio-economic Monitoring Plan do not provide sufficient detail for a Draft IS particularly as these documents are intended to support NIRB's impact assessment.	1. Updated draft plans with sufficient Project-specific information have not been provided. 2. The plans rely on placeholders and information deferred to future stages. 3. Preliminary assessments, mitigation measures, monitoring, and adaptive management actions are not adequately described. 4. These gaps limit the ability of NIRB and intervenors to evaluate the proposed Project.	The Proponent should provide updates draft Plans with sufficient information that contain preliminary assessments and proposed mitigation to allow the NIRB and intervenors to evaluate the proposed Project, not placeholders.
NIRB	427.	West Kitikmeot Resources Corp.	Conclusion	Vol. 10, s. 36.1 Project Assessment Conclusions, p. 36-1; Vol. 1 Executive Summary, Conclusions, ES-38–ES-40; Vol. 1 Appendix A, s. 12.0 concordance, A-201.	Volume 10 Section 36.1 provides a brief final conclusion stating that VCs were evaluated using Inuit, Indigenous, and Community Knowledge alongside western science, that measures will reduce or manage adverse effects, that residual effects are not anticipated to be significant, and that positive effects are expected particularly for training, employment, and the economy. However, the conclusion is highly condensed and does not provide a structured synthesis across the biological, ecological, physical, health, social, economic, and cultural categories named in the Guidelines.	The conclusion does not provide a consolidated final table or narrative that links each impact category to the relevant VCs, affected receptors, direction of effect, residual consequences, uncertainty, significance, and key mitigation/monitoring commitments. It also does not clearly identify trade-offs among environmental, socio-economic, cultural, health, and rights-related outcomes.	Provide a revised Section 36 conclusion or addendum that includes: 1. a final summary matrix organized by biological, ecological, physical, health, social, economic, and cultural impact category; 2. the VCs and receptors associated with each category; 3. positive and adverse residual impacts; 4. magnitude, duration, geographic extent, reversibility, certainty, and significance; 5. key mitigation, monitoring, and enhancement measures relied upon; and 6. a concise explanation of how the overall conclusion was reached across categories rather than only by individual VC.

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NIRB	428.	West Kitikmeot Resources Corp.	Conclusion	Vol. 10, s. 36.2 Cumulative Effects Assessment Conclusions, p. 36-1; Vol. 10, s. 32 Cumulative Effects Assessment Overview, pp. 32-1–32-18; Vol. 1 Executive Summary, ES-38–ES-39.	Section 36.2 summarizes cumulative effects and identifies the Project Inclusion List of 129 physical activities, the potential for cumulative effects to emerge under reasonably foreseeable induced development, and the conclusion that effects remain generally low to moderate and not significant. The supporting cumulative effects overview in Section 32 provides more detail.	The final conclusion does not provide a VC-by-VC cumulative-effects decision record, does not distinguish present-day, Project-only, and reasonably foreseeable induced scenarios in the conclusion, and does not identify which cumulative conclusions depend on regional measures that are outside the Proponent's direct control.	Provide a cumulative-effects conclusion table that includes: 1. each VC with a cumulative effects pathway; 2. the RFI scenario(s) used; 3. quantitative assumptions for mine, road, air, marine, fuel, workforce, and infrastructure activity where relevant; 4. the residual cumulative effect and significance conclusion; 5. key uncertainty and sensitivity factors; 6. regional measures assumed or recommended; and 7. whether the conclusion would change if regional measures are not implemented.
NIRB	429.	West Kitikmeot Resources Corp.	Conclusion	Vol. 10, s. 36.1, p. 36-1; Vol. 1 Appendix B Mitigations and Commitments; Vol. 11, s. 37 and Appendices 37A–37K management plans.	The conclusion states that measures will be in place to reduce or manage potential adverse effects and that residual effects are not anticipated to be significant. Mitigation and commitments are provided elsewhere, particularly Volume 1 Appendix B and Volume 11 management plans.	The conclusion does not summarize the key mitigation measures relied upon for final conclusions, distinguish committed measures from draft/future plan elements, or identify residual impacts that cannot be mitigated, require compensation/offsetting, or remain uncertain. It also does not identify which final conclusions depend on management plans that are still draft, preliminary, or contain placeholders.	Provide a final mitigation-and-residual-impact conclusion table identifying: 1. each key residual impact; 2. the mitigation, management, enhancement, compensation, or offsetting measure applied; 3. whether the measure is committed, draft, future, or subject to permitting; 4. monitoring and adaptive-management triggers; 5. residual impacts that cannot be fully mitigated or compensated; 6. residual significance after mitigation; and 7. management-plan dependencies and deadlines for completion before construction.

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NIRB	430.	West Kitikmeot Resources Corp.	Conclusion	Vol. 10, s. 36.1–36.2, pp. 36-1–36-2; Vol. 1 Executive Summary, ES-38–ES-40; Vol. 2 project purpose and future development sections.	The conclusion and executive summary highlight economic development benefits to the Kitikmeot and identify training, employment, and the economy as key positive effects. The IS also discusses cumulative and transboundary effects in other sections.	The final conclusion does not provide a balanced regional-and-national importance analysis that considers both benefits and adverse consequences for the Kitikmeot Region, the Nunavut Settlement Area, adjacent jurisdictions, and Canada more broadly. It does not clearly identify who receives benefits, who may experience adverse effects, and how uncertainties or mitigation dependencies affect the overall public-interest conclusion.	Provide a regional-and-national importance analysis that includes: 1. Kitikmeot-specific benefits and adverse effects; 2. distribution of benefits and burdens among communities, Inuit, other Indigenous groups, workers, governments, and third-party users; 3. implications for Nunavut infrastructure, Canadian Arctic transportation, sovereignty, emergency response, and economic development where relied upon; 4. adverse social, cultural, health, environmental, and rights-related consequences; and 5. a final balanced conclusion explaining the importance of the IS findings to the designated area and Canada generally.
NIRB	431.	West Kitikmeot Resources Corp.	Conclusion	Vol. 10, s. 36.1–36.2, pp. 36-1–36-2; Vols. 5–9 VC significance, prediction confidence, uncertainty, and follow-up sections; Vol. 11 management plans.	The final conclusion relies on the overall statement that residual Project and cumulative effects are not significant. However, across the IS some conclusions rely on future design work, draft management plans, future monitoring thresholds, offsetting, adaptive management, or positive effects that are not fully characterized.	The conclusion does not reconcile major uncertainties, future design dependencies, incomplete management plans, positive effects not characterized further, offsetting assumptions, or unresolved engagement issues with the final not-significant conclusion. Without this reconciliation, reviewers may not be able to see how all uncertainties and dependencies were weighed in the final conclusion.	Provide a final conclusion reconciliation register that identifies: 1. each VC final significance conclusion; 2. key prediction-confidence and uncertainty statements; 3. unresolved data gaps; 4. future design/permitting dependencies; 5. draft or incomplete management plans relied upon; 6. offsetting or compensation assumptions; 7. positive effects requiring enhancement or monitoring; 8. unresolved engagement or knowledge-holder concerns; and 9. whether any of these factors could change the final Project conclusion.