



August 4, 2026

Nunavut Impact Review Board
P.O. Box 1360,
Cambridge Bay, NU
X0B 0C0

NIRB File No.: 24XN038
NPC File No.: 150467

Attention: Kelli Gillard, Manager, Impact Assessment, Nunavut Impact Review Board

Re: West Kitikmeot Resources Corp. Comments on the Nunavut Impact Review Board's Information Requests – Grays Bay Road and Port Project (NIRB File No. 24XN038)
Grays Bay Road and Port Project

Dear Ms. Gillard,

Thank you for the opportunity to respond to the Information Requests (IRs) issued by the Nunavut Impact Review Board (the NIRB or the Board) on July 20, 2026 in respect of the Impact Statement (IS) for the Grays Bay Road and Port Project (the Project). West Kitikmeot Resources Corp. (WKR) is committed to supporting a thorough, efficient, and transparent review of the Project and is preparing substantive responses to the Board's Information Requests.

As part of that work, WKR has completed a preliminary review of the Board's Information Requests and, in the interest of an organized and focused response process, wishes to bring the following findings to the Board's attention. WKR has grouped a number of the Board's IRs into five categories described in more detail below. For each category, WKR has identified the specific IRs and reproduced the Board's request verbatim for ease of reference.

Category	Number of IRs	Proposed Action
Requests Beyond the Final Scope List and Impact Statement Guidelines (Out of Scope)	34	WKR requests that the Board identify the basis for each of these requests within the Final Scope List and Final IS Guidelines, or, where no such basis exists, withdraw them.
Requests Requiring Additional Engineering Design Information	31	WKR requests that these responses be deferred to the technical comment phase
Requests Associated with Management and Monitoring Plans	32	WKR requests that these IRs be addressed through an update to the monitoring and management plans to be provided prior to the Technical Meeting
Requests That Constitute Technical Comments	8	WKR requests that these responses be deferred to the technical comment phase
Other Information Requests	326	WKR will prepare responses during the Information Request phase
Total NIRB Information Requests	431	

In total, there are 105 Information Requests (or 24% of the 431 total NIRB requests) that WKR proposes to be deferred or withdrawn. WKR is currently preparing responses to 326 NIRB Information Requests (or 76% of the 431 total NIRB requests) for submission during the current phase.

Requests Beyond the Final Scope List and Impact Statement Guidelines (Out of Scope)

WKR has identified the following IRs as seeking information that, in WKR's view, is beyond the requirements of the Final Scope List and the Final Impact Statement Guidelines issued for the Project, or that is already provided within the Impact Statement. In a number of instances, the requested content appears to exceed what the Board's own governing documents require, or does not appear to account for information already presented in the IS.

WKR suggests that Board staff meet with WKR to discuss this list so WKR can provide additional context and explanation on why these requests have been identified as such. Following this discussion, WKR respectfully requests that the Board identify the basis for each of these requests within the Final Scope List and Final IS Guidelines, or, where no such basis exists, withdraw them.

NIRB IR No.	Information Request (as issued by the NIRB, verbatim)
NIRB 23	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.
NIRB 28	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.
NIRB 29	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	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 34	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.
NIRB 36	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 43	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.
NIRB 61	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 70	Provide an economic feasibility and net-benefit addendum that includes: 1) capital, operating, maintenance,

NIRB IR No.	Information Request (as issued by the NIRB, verbatim)
	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 80	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 88	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 112	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 120	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	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 127	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.
NIRB 128	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 131	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	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.
NIRB 136	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 156	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	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 200	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 218	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	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.

NIRB IR No.	Information Request (as issued by the NIRB, verbatim)
NIRB 221	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	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.
NIRB 223	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 231	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 233	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.
NIRB 251	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 272	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 311	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 345	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.
NIRB 352	Please provide information on cumulative and residual impacts to indicators selected

Requests Requiring Additional Engineering Design Information

The following IRs require detailed engineering design information that is not yet available. The Impact Statement filed in March 2026 and revised in April 2026 was prepared on the basis of a conceptual or approximately 10% engineering design and is anticipated to proceed to a pre-feasibility or approximately 30% engineering design by the end of September 2026.

During the Technical Comment phase, WKR commits to providing, as an addendum to the Impact Statement, updated design information along with a summary of the current design details that the Impact Statement is based on (e.g., permafrost design considerations, climate change resiliency design, etc.). In that addendum, WKR will answer some of the Information Requests below based on additional design detail currently under development.

For Information Requests where the requested level of design detail will not be available during the review phase, WKR will provide a timeline for when it can be shared with NIRB and interested parties, and, where applicable, a description of how the information will be incorporated into the Management and Monitoring plans prior to Project construction.

NIRB IR No.	Information Request (as issued by the NIRB, verbatim)
NIRB 178	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.
NIRB 180	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	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	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	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 185	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	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 188	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	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.
NIRB 191	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 209	Provide a marine design-update addendum confirming: 1. final port footprint; 2. dredging/infill requirements; 3.

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	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	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.
NIRB 211	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 214	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 259	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 261	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 263	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.
NIRB 264	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	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 354	Include subsections for each LAA and RAA, discuss Subsurface water and ice formation freeze and melt characteristics
NIRB 355	Include year to year variability of ground and surface water, as well as their interaction
NIRB 356	Include more discussion on near surface ground water, and focus on hydrogeological properties of deep water
NIRB 357	Include more discussion on Taliks
NIRB 364	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.
NIRB 365	Include discussion on how the potential change of taliks, as well as the potential for frost bulbs or icing formation
NIRB 368	Include groundwater physical and chemical characterizations of the ground water in the Local Study Area
NIRB 374	Include discussion on why this was not considered for the Project
NIRB 375	Include discussion regarding other waterbodies
NIRB 376	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
NIRB 381	Include discussion on how nutrient input from blasting may affect the surrounding water bodies
NIRB 424	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.

Requests Associated with Management and Monitoring Plans

The following IRs relate to management and monitoring plans that, consistent with standard practice, will be further developed as the review progresses. WKR has committed to a timeline for updating these plans in Volume 11 (Page 37-6) of the Impact Statement, which states that:

“WKR is committed to updating the plans before each of the following milestones (as required): prior to the technical meeting/pre-hearing conference; after the Pre-Hearing Conference Report is issued and before the final hearing; and final version(s) after the final hearing is completed, if necessary.”

WKR respectfully requests that the following IRs be addressed through this plan-update process. WKR commits to providing a concordance table with updated management and monitoring plans prior to the technical meeting with a description of how each of the following IRs was addressed in that update, or a rationale for why it was not addressed.

NIRB IR No.	Information Request (as issued by the NIRB, verbatim)
NIRB 161	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 173	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.
NIRB 194	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	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.
NIRB 197	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.
NIRB 199	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 206	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	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	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 215	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	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

NIRB IR No.	Information Request (as issued by the NIRB, verbatim)
	strike risk.
NIRB 255	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.
NIRB 256	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	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	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.
NIRB 260	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.
NIRB 299	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.
NIRB 308	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.
NIRB 394	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.
NIRB 412	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.
NIRB 413	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	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	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.
NIRB 416	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

NIRB IR No.	Information Request (as issued by the NIRB, verbatim)
	maintenance; 7. residual liabilities; and 8. funding/security approach.
NIRB 417	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	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.
NIRB 420	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
NIRB 421	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.
NIRB 422	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	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.
NIRB 425	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 426	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.

Information Requests That Constitute Technical Comments (per the NIRB Guide for Proponents, 2020)

In WKR's review, the following items do not constitute Information Requests as contemplated on page 62 and 63 of the NIRB's Guide for Proponents (2020), but rather fall into the NIRB's expectations of Technical comments, which are stated as follows:

1. *Determination as to whether the party agrees/disagrees with the conclusions in the DIS regarding the alternatives assessment, environmental impacts, proposed mitigation, significance of impacts, and monitoring measures – including the reasons supporting the determination;*
2. *Determination of whether or not the conclusions drawn in the DIS are supported by the analysis – and reasons to support the determination;*
3. *Determination of whether appropriate methodology was utilised in the DIS to develop conclusions – and reasons to support the determination, along with any proposed alternative methodologies which may be more appropriate (if applicable);*
4. *Assessment of the quality and presentation of the information in the DIS;*
5. *Any comments regarding additional information which would be useful in assessing impacts – and reasons to support any comments made; and,*
6. *Any recommendations for further data collection, analysis, monitoring programs, etc. that may be considered to be required to ensure that effects are minimized*

WKR respectfully requests that these items be treated as technical comments and deferred to the technical comment phase.

NIRB IR No.	Information Request (as issued by the NIRB, verbatim)
NIRB 163	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 NO ₂ , PM ₁₀ , PM _{2.5} , TSP, SO ₂ , CO, VOCs, and metals; and 6. operational responses to exceedances.
NIRB 169	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 171	Provide a terrestrial baseline addendum that includes: 1. mapping of eskers, wetlands, fragile landscapes, ice-rich terrain, thaw-sensitive slopes, taliaks, 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	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

NIRB IR No.	Information Request (as issued by the NIRB, verbatim)
	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 177	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 205	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 228	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 232	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.

In addition to the NIRB's Information Requests, which are the focus of this letter, WKR is also working through the Information Requests received from interested parties that are 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. As WKR works through these Information Requests, together with those received from the NIRB, it will issue a subsequent letter nearer to the August 19th deadline outlining a timeline for when all responses to Information Requests will be submitted to the NIRB.

WKR thanks the NIRB for its consideration of these findings and looks forward to the NIRB's direction. WKR remains available to discuss any of the above at the NIRB's convenience.

Yours truly,



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West Kitikmeot Resources Corp.

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Kassidy Koaha-Laube, Community Engagement Coordinator, West Kitikmeot Resources Corp.
Dionne Filiatrault, Executive Director, Nunavut Impact Review Board
Tara Arko, Director, Operations, Nunavut Impact Review Board
Kelli Gillard, Manager, Impact Assessment, Nunavut Impact Review Board
Amir Pourmahabadian, Senior Impact Assessment Officer, Nunavut Impact Review Board