



NIRB File #: 24XN038

GN Response to Government of the Northwest Territories IR#18	
Department	Health
Organization	Government of Nunavut
IR Response	Responding to GNWT IR#18
Subject	Medevac and Healthcare System Demand
Reference	Volume 9, Chapter 26 - Section 26.3.3.3
INFORMATION REQUEST(S)	
Provide information to support a clearer understanding of potential demand and responsibilities related to Northwest Territories (NWT) health services, including: a) Comparable Project Data • Annual personnel numbers • Annual medevac requirements • Health service utilization rates b) Onsite Medical Capacity • Description of onsite medical services (hours of coverage, staffing) • Diagnostic and treatment capabilities (e.g., X-ray, lab, point-of-care testing) • Types of conditions managed onsite and criteria for external transfer c) Medical Travel and Cost Responsibility • Responsibility for medical transport costs where non-resident workers require transfer beyond Yellowknife • Whether insurance coverage will be required for non-resident workers, or whether costs will be borne by the proponent or Government of Nunavut (GN) • Any planned agreements between the Proponent and the GN to formalize cost responsibility d) Coordination with NWT • How arrangements will account for potential reliance on Government of the Northwest Territories (GNWT) air ambulance and health services, including coordination or cost recovery mechanisms.	
GN Response	
The Government of Nunavut has an agreement in place with Keewatin Air LP for the provision of medivac services from the territory of Nunavut to relevant medical facilities in southern Canada. While the potential demand for medical services specific to the Grays Bay Road and Port Project (GBRP) has not been determined by the GN at this stage, major mining projects and	

similar project types in Nunavut that utilize the medivac service are required to cover the cost of this service as and when used.

Cost recovery for patients' diagnosis and/or treatment is addressed in accordance with the reciprocal agreement(s) that exist(s) among territories and provinces, which allows a medical care facility to invoice the medivacked patient's resident province or territory. If the Grays Bay Road and Port Project were to be approved, the same approach would automatically apply.

GN Response to Gwich'in Tribal Council IR#05	
Department	Environment, Culture and Heritage
Organization	Government of Nunavut
IR Directed to	Responding to Gwich'in Tribal Council (GTC) IR# 05
Subject	Compliance and enforcement
Reference	Nunavut Archaeological and Palaeontological Sites Regulations, SOR-2001-220.pdf
INFORMATION REQUEST(S)	
1. How is your Agency's ability to monitor, follow-up, and enforce on Project related concerns or compliance issues affected when it is a third party completing the activities/works and not the Proponent? 2. What lessons learnt from past major projects or public-private ventures can your Agency offer where contractors have failed to live up to terms and conditions of an environmental assessment? What came of the occurrences, and what lessons can be learned from these and applied to the current project? 3. What current capacity constraints would limit your Agency's ability to adequately monitor and enforce proposed Project related activities, including for transboundary activities and impacts and those related to induced development and cumulative effects?	
GN Response	
The GN recognizes the Proponent will be responsible for monitoring usership of the road and reporting back to the Nunavut Impact Review Board (NIRB). The GN understands that how this will occur will be outlined in detail within the appropriate management plans for the Project. The GN will be actively evaluating the Proponent's ability to monitor and report on usership of the infrastructure and its potential impacts to the environment. The GN reviews proponents' annual reports for major developments within Nunavut and makes recommendations for each Project. For specific examples, please refer to the GN's submissions available on the NIRB website. Where the GN determines that terms and conditions are not being fulfilled by the Proponent, the GN engages directly with the Proponent to try and resolve the issue. If the issue is not resolved, the GN will exhaust all potential avenues available, including the NIRB process, working groups and through enforcement actions (within the GN or with Crown-Indigenous Relations and Northern Affairs inspectors). Proponents of major projects will often have third-party contractors doing work on their behalf. The ultimate responsibility to	

maintain compliance with the terms and conditions of the Project Certificate and demonstrate the compliance to NIRB lies with the Proponent.

Where Project activities engage the *Nunavut Archaeological and Palaeontological Sites Regulations*, the applicable requirements apply regardless of whether the work is undertaken by the Proponent or by a third-party contractor. Archaeological and palaeontological fieldwork associated with development projects is commonly undertaken by consultants retained by a proponent. Where this work requires a Nunavut Archaeologist or Palaeontologist Permit, the permit is issued to a named individual. Any change to the permit holder requires review and approval by the Department of Culture and Heritage, and the permit holder remains responsible for complying with the applicable permit requirements, including the reporting requirements under section 14 of the *Regulations*. The *Regulations* also prohibit any person from undertaking specified archaeological or palaeontological activities without the required permit.

Conduct by a proponent, contractor or other person that contravenes the archaeological or palaeontological site protections in the *Regulations* may also constitute an offence under the *Nunavut Act*.

Culture and Heritage's routine monitoring of archaeology permit compliance is primarily undertaken through review of the reports and other documentation required under the permit and *Regulations*. Broader monitoring and compliance associated with the Project and its Project Certificate are separate from the archaeology permitting process.

The GN will continue to exercise its responsibilities within the full scope of its mandate and jurisdiction.

GN Response to Gwich'in Tribal Council IR#14	
Department	Community Services, Transportation and Infrastructure Nunavut
Organization	Government of Nunavut
IR Directed to	Responding to GTC IR# 14
Subject	Assessment of anticipated future development scenarios for induced developments associated with the Grays Bay Road and Port Project.
Reference	2017, Grays Bay Road and Port Project Proposal, NIRB directory: 170721-17XN011-GBRP Project Proposal-IA1E (1).pdf Ingirrasiliqta, GN Transportation Strategy, Action 9.2, pg. 23, 12-246E-2014-05-28 GN DNLUP Submission Annexe 4 GN Transportation Strategy.pdf 2018, Economic Assessment of Grays Bay Road and Port Project for Nunavut Resources Corporation, Impact Economics, Economic Assessment of the Grays Bay Road and Port Project
INFORMATION REQUEST(S)	
1. Submit related studies and summaries of analysis to the NIRB Public Registry of government-led or funded analyses, studies, or other forms of assessment related to economic and socio-economic costs, benefits, and potential of an operational road and port at Grays Bay like that proposed by West Kitikmeot Resources Corp (WKR). 2. Provide a summary of anticipated induced development scenarios, including a minimum anticipated scenario, and an anticipated likely scenario, of projects, activities, and potential over the lifetime of the project (e.g., in perpetuity). 2.1. Identify underlying assumptions related to the development scenarios. 2.2. Provide the timeline of construction and operation of projects or activities identified. 2.3. Identify marine traffic or vessel components related to the construction or operation of the Project or for those supporting terrestrial-based projects, as well as expected increases in marine traffic and vessels anticipated with the development of a major port at Grays Bay, and the likely source of travel of these vessels within and beyond Nunavut.	
GN Response	
1. The Nunavut Transportation Strategy supports options for a port and road (Action 9.2), where, at the time of the strategy's development, the Conference Board of Canada projected a port and road would provide significant economic benefits to Nunavut over a 20-year period.	

The Government of Nunavut was a co-proponent for a previous project proposal for a road and port at Grays Bay. A project proposal was jointly submitted by the Kitikmeot Inuit Association (KIA) and Government of Nunavut in 2017.

Extensive preliminary studies have been performed by various parties for a possible road and port in the region. The 2017 GN/KIA proposal relied on:

- Baseline studies and effects assessments for several development projects in the area, including MMG Resources Inc's (MMG's) Izok Corridor project.
- Consultations with KIA's membership and other indigenous, community, and regional stakeholders.
- Review of Traditional and Inuit Qaujimajatuqangit regional studies.
- And direct consultations performed by the co-proponents.

Relevant documents submitted for this project proposal can be found on the NIRB website under NIRB File No: 17XN011. The following link provides access to an Economic Assessment of Grays Bay Road and Port Project, dated January 2018: [Economic Assessment of the Grays Bay Road and Port Project](#).

The GN understands that the Major Projects Office (MPO) is currently undertaking an economic analysis of the Grays Bay Road and Port Project.

2. These questions are relevant for the current project proponent. The GN is no longer a co-proponent for the Grays Bay Road and Port Project. The GN is instead acting as an intervenor in the Nunavut impact assessment process and will participate in that capacity within the NIRB-led review of West Kitikmeot Resources' Grays Bay Port and Road project proposal.

GN Response to Gwich'in Tribal Council IR#15	
Department	Community Services, Transportation and Infrastructure Nunavut
Organization	Government of Nunavut
IR Directed to	Responding to GTC IR# 15
Subject	Assessment of anticipated future development scenarios for induced developments associated with the Grays Bay Road and Port Project.
Reference	2017, Grays Bay Road and Port Project Proposal, NIRB directory: 170721-17XN011-GBRP Project Proposal-IA1E (1).pdf Ingirrasiliqta, GN Transportation Strategy, Action 9.2, pg. 23, 12-246E-2014-05-28 GN DNLUP Submission Annexe 4 GN Transportation Strategy.pdf 2018, Economic Assessment of Grays Bay Road and Port Project for Nunavut Resources Corporation, Impact Economics, Economic Assessment of the Grays Bay Road and Port Project
INFORMATION REQUEST(S)	
1. Submit related studies and summaries of analysis to the NIRB Public Registry of government-led or funded analyses, studies, or other forms of assessment related to economic and socio-economic costs, benefits, and potential of an operational road and port at Grays Bay like that proposed by WKR. 2. Provide a summary of anticipated induced development scenarios, including a minimum anticipated scenario, and an anticipated likely scenario, of projects, activities, and potential over the lifetime of the project (e.g., in perpetuity). 2.1. Identify underlying assumptions related to the development scenarios. 2.2. Provide the timeline of construction and operation of projects or activities identified. 2.3. Identify marine traffic or vessel components related to the construction or operation of the Project or for those supporting terrestrial-based projects, as well as expected increases in marine traffic and vessels anticipated with the development of a major port at Grays Bay, and the likely source of travel of these vessels within and beyond Nunavut.	
GN Response	
Please refer to the GN response to GTC-14, above, as the information requested is the same.	

GN Response to Yellowknives Dene First Nation IR# 4	
Department	Environment
Organization	Government of Nunavut
IR Directed to	Responding to YKDFN IR# 4
Subject	Restriction of cumulative effects assessment on BCH to area in Nunavut. Reasonably foreseeable and reasonably foreseeable induced projects outside Nunavut (i.e., Assessment Area 1 of the Bathurst Caribou Range Plan) are ignored in the cumulative effects assessment.
Reference	N/A
INFORMATION REQUEST(S)	
c) For the GN, GNWT and the Mackenzie Valley Environmental Impact Review Board (MVEIRB), please provide any information with respect to the cumulative effects on the entire range of the Bathurst Caribou Herd (BCH).	
GN Response	
The GN notes that projects within Nunavut have been captured within the scope of the impact assessment. For projects outside Nunavut, the GN defers to the GNWT to capture any additional projects that should be considered. Furthermore, the GN and GNWT work closely on Bathurst Caribou Herd management, with the GNWT leading the majority of work on the Bathurst Caribou Herd. As such, the GN defers the response to this information request (IR) to the GNWT.	

GN Response to Yellowknives Dene First Nation IR# 11	
Department	Environment
Organization	Government of Nunavut
IR Directed to	Responding to YKDFN IR# 11
Subject	Restrictions on access for hunting.
Reference	N/A
INFORMATION REQUEST(S)	
b) For the Proponent, GN and KIA, please comment on the merit of restricting hunter access to areas west of the GBRP.	
GN Response	
The GN will consider the Project's potential impacts on caribou and how they can be avoided, where possible, or mitigated as we receive more information as the NIRB review proceeds. Additionally, the GN is keen to better understand how the Proponent will manage access to the road and looks forward to evaluating their proposed approach during the technical review phase.	

GN Response to Yellowknives Dene First Nation IR# 17	
Department	Environment
Organization	Government of Nunavut
IR Directed to	Responding to YKDFN IR# 17
Subject	Bathurst caribou population dynamics and population decline.
Reference	N/A
INFORMATION REQUEST(S)	
a) Please provide population projections for the BCH that represent the possible outcomes with the Project and with the reasonably foreseeable and reasonably foreseeable induced developments.	
GN Response	
The GN and the Government of the Northwest Territories (GNWT) work closely on Bathurst Caribou Herd management, with the GNWT leading the majority of work on the Bathurst Caribou Herd. As such, the GN defers to the GNWT on the response to this information request.	