WEST KITIKMEOT RESOURCES CORP

GRAYS BAY ROAD AND PORT PROJECT

WASTE MANAGEMENT PLAN

EARLY PERMITTING/IMPACT ASSESSMENT PHASE

WKR MP 05

Version 1

Summary

This *Waste Management Plan* describes what is done with any waste generated during West Kitikmeot Resources Corp.'s field programs.

Revision Table

Version	Author/Reviewer	Notes	Date	Sent To
1.0	SHC	Internal. First draft sent to WKR	October 11, 2024	WKR

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Abbreviations

CCME ..... Canadian Council of Ministers of the Environment
GIS ..... Geographic Information System
KIA ..... Kitikmeot Inuit Association
km ..... kilometer
NT ..... Northwest Territories
NU ..... Nunavut
The Company ..... West Kitikmeot Resources Corp
The Plan ..... Environmental Management Plan
The Project ..... Grays Bay Road and Port Project
TDG ..... Transportation of Dangerous Goods
WHMIS ..... Workplace Hazardous Materials Inventory System
WKR ..... West Kitikmeot Resources Corp

Glossary

Environment Manager	Designated WRK staff, responsible for Implementation of this Plan
Kitikmeot Inuit Association	A not-for-profit designated Inuit organization with community-elected leadership representing Inuit of the Kitikmeot Region of Nunavut. Their goal is to support Kitikmeot Inuit, providing them with more educational, employment, and business opportunities (KIA 2024).
Kitikmeot Region	The most western region of the Nunavut territory. It consists of the southern and eastern parts of Victoria Island with the adjacent part of the mainland and includes five permanent communities of: Cambridge Bay, Gjoa Haven, Kugaaruk, Kugluktuk and Taloyoak.
The Program	Field studies occurring concurrent with and in support of Project impact assessment, and early permitting

1 Introduction

West Kitikmeot Resources Corp. (WKR; the Company) is an Inuit-owned, Inuit-led company, based in Cambridge Bay, Nunavut. WKR is primarily focused on the advancement of the Grays Bay Road and Port Project (the Project). The Company's largest shareholder is a wholly-owned subsidiary of the Kitikmeot Inuit Association (KIA).

The Project is proposed as multi-user, multi-use transportation infrastructure to be located on a combination of Inuit Owned Land and Crown land in the Kitikmeot Region of western Nunavut. Subject to approval, the Project would result in the establishment of the first deep-water port in the Canadian Central Arctic at Grays Bay, as well as a 230 kilometre (km) all-season access road between Grays Bay and Jericho station near Contwoyto Lake. The Project will connect to the already approved Tibbitt to Contwoyto Winter Road (TCWR). The multi-user, multi-use Project would allow for the establishment of shared infrastructure with many potential users including the federal and territorial governments, communities, community members, resource companies, and defence agencies.

In support of advancing the design of the Project and of assessing impacts of the Project on the biophysical and socio-economic environment, WKR commenced field studies in July 2024. These studies are a continuation of, or are supplemental to, baseline studies screened and undertaken historically. This includes collecting biophysical environmental data, maintaining existing and installing new scientific instrumentation required to support environmental data collection, and undertaking design-related studies. These studies occur concurrent with Project impact assessment, and early permitting, and are referred to here as the Program.

1.1 Purpose

The purpose of this *Waste Management Plan* (the Plan) is to describe how waste generated by the Program is managed.

Plan objectives include:

- Ensure employees and contractors are trained to manage waste in a safe and compliant manner;
- Outline appropriate waste management measures to ensure environmental protection; and
- Identifying applicable reference materials, including legislation and guidance documents.

This Plan considers the guidance and requirements provided in the documents listed in Table 1.1, which may be updated from time to time.

Table 1.1 Related Project documents and authorizations

Document	Authority
Transportation of Dangerous Goods Act (1992) and Regulations (2015)	Government of Canada
Canadian Environmental Protection Act (1999)	Government of Canada
Hazardous Products Act (1985)	Government of Canada
Interprovincial Movement of Hazardous Waste Regulations (2002)	Government of Canada
Nunavut Water Nunavut Surface Rights Tribunal Act (2002) and *Nunavut Water Regulations* (2013)	Government of Canada
Territorial Lands Act (1985) and *Land Use Regulations* (2016)	Government of Canada
Environmental Code of Practice for Aboveground and Underground Storage Tank Systems Containing Petroleum and Allied Petroleum Products (2003)	Canadian Council of Ministers of the Environment
Environmental Guideline for the General Management of Hazardous Waste in Nunavut (2010)	Government of Nunavut
Screening Decision	Nunavut Impact Review Board
Water Licence	Nunavut Water Board
Land Use Licence	Kitikmeot Inuit Association
Land Use Permit	Government of Canada

1.2 Scope

This Plan applies to Program activities occurring in the field during the early permitting/impact assessment phase of the Project, including baseline field studies on land, in freshwater and in the marine environment, and geotechnical drilling.

Workers are housed in existing licensed accommodations, such as nearby exploration camps; management of camp-related waste streams is addressed pursuant to existing authorizations in place for those facilities. Waste streams that require handling and transport may be backhauled to accommodations facilities and managed there, or transported offsite.

1.3 Plan Management

This Plan is reviewed annually at minimum by the Environment Manager or designate and revised as needed to reflect the terms and conditions of Project authorizations, outcomes of ongoing engagement, acquisition of Inuit Knowledge, and needs of both community members and WKR.

This Plan is effective upon approval, is valid throughout the early permitting/impact assessment phase of the Project, and may be updated from time to time.

A copy of this Plan is maintained on the corporate server in a manner such that it is accessible to workers. A copy is also maintained in any field office locations.

1.4 Roles and Responsibilities

WKR is responsible for implementation of this Plan. Table 1.2 outlines how to connect with the WKR team.

All workers, including staff, contractors, suppliers and visitors, are required to implement this Plan as it pertains to their field activities, including, segregating and disposing of waste in the receptables provided, ensuring no food waste or open top vessels containing waste are left unattended, and collecting all non-mineral waste generated in the field and returning it to camp for proper disposal.

Additional responsibilities may be assigned to designated persons including the Environment Manager, crew leads/managers/supervisors and the drill contractor.

The **Environmental Manager** is responsible for overall implementation of this Plan. Specific duties include: verifying that adequate communication and training occur and adequate procedures are developed for waste management; allocating adequate resources, retaining competent personnel to carry out the work and ensuring sufficient supplies are available for compliant waste management; obtaining a hazardous waste generator #, and maintaining related documentation; directing and reviewing incident investigations and related corrective action planning; implementing an assurance program to verify contractor compliance to this Plan.

Crew leads, managers and/or supervisors have a responsibility to ensure that workers on their team have been trained in WKR waste management procedures, that facility inspections are routinely conducted (as applicable), that secondary containment facilities are adequately, and provide appropriate oversight of waste handling, transport, and management, as applicable. Further, the WKR field program manager involved in the drill program is responsible for ensuring drill site inspections are conducted following each drill move and that all corrective actions are completed prior to commencing drilling at the next site.

Drill contractors are responsible for ensuring that drill sites are managed in accordance with WKR waste management expectations and procedures. Additional drill contractor responsibilities include:

- Depositing drill cuttings in areas designated by WKR;
- Dewatering cuttings to the greatest extent possible;
- Ensuring that cuttings do not flow in an uncontrolled manner to the surrounding land or ice;
- Recording the location of any drill cuttings disposal areas that may be established;
- Transporting waste from the drill site to the camp, and segregating and disposing of that waste appropriately;
- Conducting a drill site inspection on each shift;
- Conducting corrective action planning and implementation in a timely manner that supports maintaining ongoing site compliance;
- Maintaining records of inspections, personnel training, equipment testing and maintenance;
- Ensuring drill site inspections are conducted following each drill move and that all corrective actions are completed prior to commencing drilling at the next site.

Table 1.2 Proponent Contacts and Information

Item	Detail
Project Name	Grays Bay Road and Port Project
Proponent	West Kitikmeot Resources Corp.
Address	Head office: P.O. Box 6, 30B Mitik Street, Cambridge Bay, NU X0B 0C0 Project office: Suite 2110, 500 4 Ave SW, Calgary, AB T2P 2V6
Responsible Executive	Elliot Holland, Chief Operating Officer eholland@westkit.ca 867.446.0309
Principal Contact	Gavin Law, Environment Manager & Engagement Lead glaw@westkit.ca 403.837.5677
Website	www.westkit.ca

1.5 Site Description

As shown in Figure 1.1, the Project is entirely located within the Kitikmeot Region of Nunavut. Project. The northern extent of the Project area at the proposed port site and road terminus is located approximately 180 km east of Kugluktuk, NU at 505441.56 E / 7521154.57 N, while the southern extent of the Project area and proposed road terminus is located at the Jericho Mine site, approximately 400 km northeast of Yellowknife, Northwest Territories (NT) at 479617.47 E/

7319795.35 N. Main points of access include Kugluktuk, NU, Cambridge Bay, NU and Yellowknife, NT, as well as existing regional mineral project camps site, when operational. The Project Area is primarily accessed by helicopter, while area can be reached by fixed wing aircraft, boat or snowmobile.

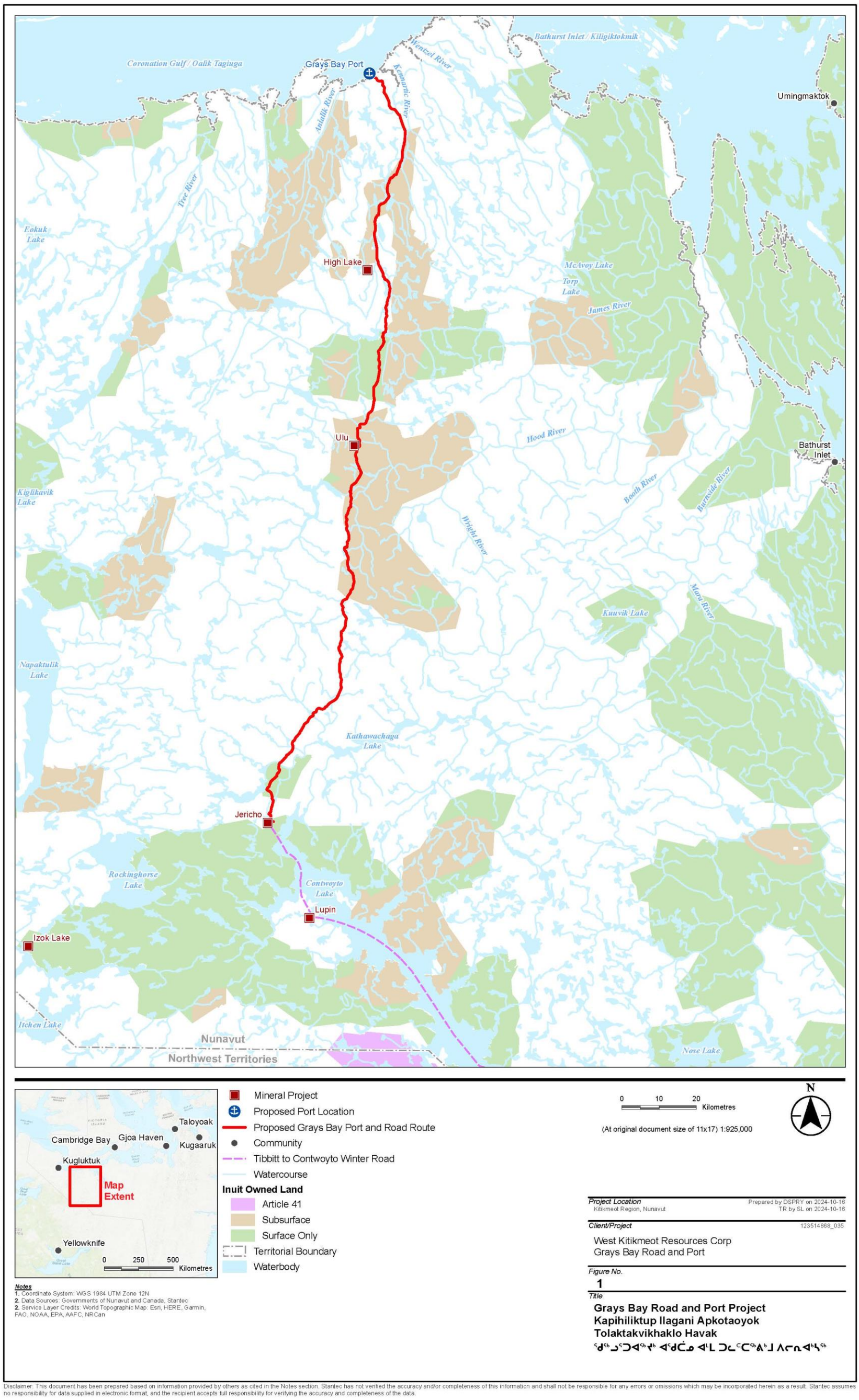

Figure 1.1 Grays Bay Road and Port Project

2 Waste Types

Types of waste that may be generated through the Project include:

- Non-mineral waste;
- Mineral waste;
- Domestic waste;
- Potentially hazardous waste.

Non-mineral waste includes construction waste, spent parts and equipment, and domestic waste, all generated through routine drilling and field activities. Non-mineral waste may be combustible or non-combustible.

Mineral waste includes cuttings from the drilling and related drill water.

Domestic waste is food-related waste generated at field work sites.

Potentially hazardous waste includes spent spill response materials, spent oil filters, oily rags and containers, used batteries, used oil and contaminated soil that may occur as a result of a spill. Precipitation accumulating in secondary containment may also be potentially hazardous.

3 Waste Management

Proper waste management is required to ensure worker safety, maintain environmental integrity, avoid wildlife encounters and support ongoing site compliance. Waste generated on site will be either treated or disposed of on site, or backhauled for disposal and/or treatment off-site at a suitable facility. Waste streams and their management are listed in Table 7.1.

Where waste is backhauled for disposal or treatment, considerations for preparing materials for off-site disposal include:

- Bulking like materials together (avoid co-mingling waste streams);
- Utilizing proper containers suitable for the material and volume being stored;
- Properly labelling storage containers and areas in accordance with the Workplace Hazardous Materials Information System (WHMIS) and *Transportation of Dangerous Goods* (TDG) *Regulations* (2012);
- Staging waste awaiting backhaul in areas with suitable containment;
- Disposing of waste on a regular basis and not allowing excess waste to accumulate in work areas.

Secondary containment for fuel and other materials supports waste management as any leaked materials or precipitation that accumulates within secondary containment is treated as a waste stream. Accordingly, aspects of secondary containment management are discussed in this Plan, with more detail provided in the *Spill Contingency Plan*. Any accumulated precipitation is

discharged through an activated carbon filter such as Rain Drain[1] or Spill Monkey. If needed, WKRs may pump accumulated water out of secondary containment into another vessel such as empty drum and backhaul for treatment and disposal. Any waste that may attract wildlife is securely stored.

Open burning is limited; solid wastes that are conditionally suitable for open burning are large or bulky paper products, paperboard packaging and untreated wood. Plywood, painted wood or other treated wood should not be disposed of in this manner, and instead is backhauled for suitable management offsite.

4 Waste Infrastructure

As listed in Table 7.1, waste infrastructure that may be implemented includes to sumps and natural depressions for drill waste, and an activated carbon filter for treating precipitation that accumulates within fuel secondary containment.

Sump and natural depression locations are chosen based on the local terrain, proximity to source, distance from nearby watercourses (>31 m) and expected capacity needs. Disposal locations are routinely monitored to ensure capacity is sufficient and stable.

5 Training

All workers participate in a Project orientation which outlines waste management obligations that must be fulfilled and identifies related roles and responsibilities.

6 Monitoring & Inspection

Monitoring of waste management facilities includes inspection of fuel storage areas when in use and inspection of drills before, during and after activities at each drill.

Drill sites are inspected by the field program manager or designate to document pre-disturbance conditions, compliant drill site management, and suitable clean-up and stabilization of drill areas. Frequency of drill site inspections varies as the duration the drill may be in a particular location varies with program scope and conditions encountered.

Inspection documents identified in the following section are available for the Inspector to review upon request.

[1] Manufacturer (SEI Industries) specifications for the Rain Drain activated carbon filter indicates that effluent discharged through a Rain Drain meets Canadian Council of Ministers of the Environment (CCME) *Environmental Code of Practice for Aboveground and Underground Storage Tank Systems Containing Petroleum and Allied Petroleum Products*, being **15 mg/L of free oil and grease** (section 3.10.3(1)i; CCME 2003).

7 Reporting & Documentation

Reporting occurs pursuant to its authorizations, where applicable.

Waste management documents are retained by WKR at the field program office, including waste manifests, facility inspection records and material inventories.

A layer in the Project GIS system is maintained identifying the location of all sumps and natural depressions used, and the location of waste management infrastructure.

A copy of documents can be made available to an Inspector upon request.

Table 7.1 Waste streams and related management

Type of Waste		Composition	Quantity Generated	Management Rationale				
				Reduce	Reuse	Recycle/ Recover	Treat	Dispose
Non-Mineral Waste	Combustible Wastes	Clean wood, paper, cardboard, domestic waste	Various		Reuse/ repurpose wood where possible	When backhauled, recycle cardboard and paper offsite	Open burn wood, paper and cardboard	Backhaul ash, and domestic waste for disposal offsite
	Non-combustible waste	Various containers, scrap metal, plastics, hoses	Various	Purchase in bulk to reduce packaging, where available	Repurpose containers and scrap where safe and suitable	Backhaul all recyclables to waste receiver for suitable handling	Crush to reduce bulk for shipping	Backhaul all non-recyclables to waste receiver for suitable disposal
Mineral Waste	Drill cuttings	Rock, water, salt, non-toxic drill additives	Various	Recirculate drill water to reduce freshwater required	Reuse drill water where possible		Settling tanks and/or use of flocculants to support reuse where possible	Capture with casing pot, discharge to natural depression or sump
Potentially Hazardous Waste	Hazardous waste	Oily rags, spent filters, batteries, containers, used oil, contaminated soil, hydraulic fluid, solvents, and other similar materials used for cleaning and maintenance	Various			Backhaul all recyclables to waste receiver for suitable handling		Backhaul all non-recyclables to waste receiver for suitable treatment and/or disposal
	Water from secondary containment	Water, hydrocarbons	Various			Pump out for backhaul and treatment offsite	Activated carbon filter	Discharge treated effluent to upland area
	Spent spill response materials	Various absorbent materials	Various					Backhaul for disposal offsite

8 References

Canadian Environmental Protection Act. S.C. 1999, c.33

Hazardous Products Act. R.S.C., 1985, C. H-3

Interprovincial Movement of Hazardous Waste Regulations. SOR/2002-301

Nunavut Waters and Nunavut Surface Rights Tribunal Act. S.C. 2002, c.10

Nunavut Waters Regulations. SOR/2013-69

Territorial Lands Act. R.S.C., 1985, c. T-7

Territorial Land Use Regulations. SOR/2016 R-32, s.1.

Transportation of Dangerous Goods Act. S.C. 1992, c.34

Transportation of Dangerous Goods Regulations. SOR/2012-245

Government of Nunavut. 2010. Environmental Guideline for the General Management of Hazardous Waste in Nunavut.

Canadian Council of Ministers of the Environment (CCME). 2003. Environmental Code of Practice for Aboveground and Underground Storage Tank Systems Containing Petroleum and Allied Petroleum Products. PN 1326. Winnipeg, MB. Current to October 2015.