

Environmental Protection Operations Directorate
Prairie & Northern Region
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ECCC File: 6100 000 002/012
NIRB File: 25EN034



July 15, 2025

via email at: info@nirb.ca

Kelli Gillard
Manager Impact Assessment
Nunavut Impact Review Board
29 Mitik Street
P.O. Box 1360
Cambridge Bay, NU X0B 0C0

Dear Kelli Gillard:

RE: 25EN034 – MMG Resources Inc – Izok Corridor Exploration Project – Notice of Screening

Environment and Climate Change Canada (ECCC) has reviewed the information submitted to the Nunavut Impact Review Board (NIRB) by MMG Resources Inc. (the Proponent) regarding the above-mentioned notice of screening.

ECCC provides expert information and knowledge to project assessments on subjects within the department's mandate, including climate change, air quality, water quality, biodiversity, environmental emergencies preparedness and responses. This work includes reviewing proponent characterization of environmental effects and proposed mitigation measures. We provide advice to decision-makers regarding a proponent's characterization of environmental effects, the efficacy of their proposed mitigation activities, and may suggest additional mitigation measures. Any comments received from ECCC in this context does not relieve the proponent of its obligations to respect all applicable federal legislation.

The following comments are provided:

1. Species at Risk

Reference(s)

- Izok Corridor Exploration Project – Notice of Screening



Comment

Species at risk are assessed by the Committee on the Status of Endangered Wildlife in Canada (COSEWIC) or added to Schedule 1 of the *Species at Risk Act* (SARA) on a regular basis. It is important for proponents to ensure they are aware of what species are present in the project area and take appropriate actions to ensure compliance with the SARA.

The killing, harming or harassing of listed species as well as the damage and destruction of their residences is prohibited under SARA. In the territories, the prohibitions apply automatically to:

- Threatened, Endangered and Extirpated species listed on Schedule 1 of SARA on lands under the authority of the federal Minister of Environment;
- Migratory Birds (as defined under the *Migratory Birds Convention Act* [MBCA]) everywhere they are found.

These prohibitions can apply elsewhere if there is an order put in place.

The destruction of critical habitat of species listed under Schedule 1 of SARA is prohibited on all lands identified within the critical habitat protection order for the species.

ECCC Recommendation(s)

As species are assessed and listed on a regular basis, ECCC recommends the Proponent:

- a. Consult the [Species at Risk registry](#) to obtain the most current information for their operations;
- b. Consult the Government of Nunavut to identify appropriate mitigation and/or monitoring measures to avoid and lessen project effects to species under their management responsibility.

2. Species at Risk – SAR Missing and/or Effects and Measures Missing

Reference(s)

- Izok Corridor Exploration Project – Notice of Screening

Comment

Section 79 of SARA requires the assessor and decision body to ensure that where a project is likely to affect a listed species or its critical habitat, all adverse effects of the project are identified and considered in the assessment of the project. Appropriate measures must be taken to avoid or lessen those effects and include monitoring. Measures should be consistent with applicable recovery documents.

Section 79 applies to all listed species on Schedule 1 of SARA including those listed as Special Concern, Threatened, Endangered and Extirpated. As a matter of best practice, COSEWIC-assessed species should be assessed similarly to those listed under SARA.

The Proponent has not identified any species at risk that are likely to be present in the Project area, nor has the Proponent identified all adverse effects of the Project on species at risk.

The attached Appendix I contains a list of the species that are likely to be encountered in the Project area that have been assessed as at risk by COSEWIC or listed on Schedule 1 of SARA.

The Project may have adverse effects on listed species including direct habitat loss, impacts due to noise, dust or other sensory disturbances, wildlife injury or mortality and wildlife attraction.

ECCC Recommendation(s)

ECCC recommends the Proponent:

- a. Identify adverse effects of the Project on the species at risk likely to be affected and their critical habitat;
- b. Ensure that measures are taken to avoid or lessen those adverse effects and monitor them to inform adaptive management.

If the Proponent encounters species at risk, the primary mitigation measure should be avoidance. ECCC recommends:

- c. Mitigation and monitoring measures be consistent with applicable species at risk Recovery Strategies and Action Plans or Management Plans;
- d. At a minimum, monitoring should include recording the timing and location of observed species at risk, their behavior when encountered, and actions taken by the Proponent to avoid disturbance to the species, its habitat, and/or its residence;
- e. The Proponent submit monitoring reports to the appropriate regulators and organizations with management responsibility for that species.

3. Project Activities Within Migratory Bird Habitat Project Activities During Nesting Season

Reference(s)

- Izok Corridor Exploration Project – Notice of Screening

Comment

The *Migratory Birds Regulations* (MBR) prohibit the disturbance or destruction of migratory birds and their nests or eggs.

The Project occurs during the nesting season for migratory birds which extends from early May to mid-August for this region (Nesting Zones C8 and N9).

Migratory birds, their nests and their eggs can be inadvertently harmed, killed, disturbed or destroyed because of many activities including, but not limited to, clearing of trees and other vegetation, draining or flooding land, or using fishing gear. Harming of individual birds, nests or eggs, can have long-term consequences for migratory bird populations in Canada, especially through the cumulative effects of many different incidences.

ECCC Recommendation(s)

ECCC recommends the Proponent carry out all phases of the Project in a manner that reduces risk to migratory birds and to avoid harming, killing or disturbing migratory birds or destroying, disturbing or taking their nests and eggs.

Proponents should not conduct potentially destructive or disruptive activities at key locations or during key periods to avoid negative impacts to migratory birds. In this regard, the Proponent should take into account ECCC's [Guidelines to Avoid Harm to Migratory Birds](#) and visit [Fact Sheet Nest Protection Under the Migratory Birds Regulations, 2022](#) and [Frequently Asked Question, Migratory Birds Regulations, 2022](#) for more information on the amended Migratory Bird Regulations and updates to nest protections.

4. ECCC Contact Information

Reference(s)

- Izok Corridor Exploration Project – Notice of Screening

Comment

The Proponent has provided a wildlife management plan but has not identified ECCC as a contact for instances involving migratory birds.

ECCC has management responsibilities for migratory birds under the MBCA. ECCC should be contacted in instances involving:

- Interactions and incidents involving the potential disturbance of individuals or nests and any mortality events of these species; and
- Updates to wildlife management and monitoring plans, or their equivalents, in relation to these species.

ECCC Recommendation(s)

ECCC recommends the Proponent notify ECCC's Canadian Wildlife Service (cwsnorth-scfncord@ec.gc.ca) for instances involving:

- a. Interactions and incidents involving the potential disturbance of individuals or nests and any mortality events of these species; and

- b. Updates to wildlife management and monitoring plans, or their equivalents, in relation to these species.

5. Spill Prevention of Park Vehicles and Heavy Machinery

Reference(s)

- Spill Contingency Plan Exploration Operations Izok / Hood Property
- Spill Contingency Plan Exploration Operations High Lake Property

Comment

The Proponent intends to use various types of heavy machinery, as outlined in Section 3 of the Spill Contingency Plan, in remote areas where accidents or malfunctions could result in the release of hazardous materials. To mitigate the risk of environmental contamination, especially impacts to wildlife and water quality, it is important that remote worksites are equipped with adequately stocked spill kits and that drip trays are used under stationary or parked vehicles [1].

ECCC notes that the contents of both the general spill kit and the drill-specific spill kits are described in Section 10 of the Spill Contingency Plan. However, the drill spill kits intended for use during exploratory operations away from the camp do not include materials suitable for responding to spills that may occur on or near water. Ensuring spill kits are appropriately equipped and readily accessible is essential for minimizing environmental impacts in the event of a spill.

[1] Government of the Northwest Territories. (2015). Northern land use guidelines: Northwest Territories seismic operations. Government of the Northwest Territories, Department of Lands. <https://www.lands.gov.nt.ca>

ECCC Recommendation(s)

ECCC recommends the following mitigation measures to reduce the potential environmental impact of spills associated with Project activities:

- a. Include oil-absorbent booms in all drill spill kits to enable rapid response to spills occurring on or near water;
- b. Use drip trays under all parked vehicles and heavy machinery, especially in areas where leaks commonly occur, to contain hydrocarbon drips and other hazardous materials susceptible to leaking.

If you need more information, please contact Kelvin Mok at 647-951-8836 or Kelvin.Mok@ec.gc.ca

Sincerely,

Kelvin Mok
Environmental Assessment Officer

Attachment(s): Appendix I Species at Risk Table

cc: Eva Walker, Head, Environmental Assessment North (NT and NU)
Cristina Ruiu, Manager of Environmental Assessment and Expert Support, Prairies and Northern Region