



July 15, 2025
by EMAIL

Kelli Gillard
Manager, Project Monitoring
Nunavut Impact Review Board
PO BOX 1360
CAMBRIDGE BAY, NU, X0B 0C0

Dear Kelli Gillard:

The Government of the Northwest Territories Submission on the Review of the Nunavut Impact Review Board's Screening of MMG Resources Inc. Izok Corridor Exploration Project (NIRB file number #25EN034)

The Government of the Northwest Territories – Environment and Climate Change (GNWT-ECC) provides this submission as requested in response to the Nunavut Impact Review Board (NIRB)'s screening assessment and associated public comment period for the Izok Corridor Exploration Project (#25EN034), proposed by MMG Resources Inc. (MMG).

GNWT-ECC notes that the Wildlife Management Plan submitted by MMG Resources Inc. has not been updated since 2011. This letter is to further indicate that it should be revised to align with the most recent Project Description (2025), incorporate current wildlife mitigation practices, and include relevant recommendations from existing range plans for caribou herds within the project area.

The reviewer recommends updating the 2011 Wildlife Management Plan to incorporate an overall project map delineating the ranges of the Bathurst, Dolphin and Union caribou herds, along with the integration of Mobile Caribou Conservation Measures (MCCMs). Additionally, it is suggested that references to "caribou herding" procedures be revised or removed, while clearer definitions of "large herds" and group size thresholds should be established to guide mitigation efforts. The inclusion of high-altitude reconnaissance surveys, as referenced in the 2025 Project Description, is also advised.

Further, it is recommended that MMG collaborate with GNWT-ECC to implement an Information Release Agreement, ensuring access to regularly updated GPS caribou collar data. GNWT-ECC's caribou occupancy analysis, which evaluates seasonal caribou presence near exploration camps, offers valuable insights for adjusting monitoring efforts and operational activities based on the likelihood of caribou interactions. These proposed measures aim to strengthen wildlife management and mitigation strategies for the project.

GNWT-ECC provides the attached for the consideration of NIRB and the proponent:

- Comment Form for NIRB Screenings

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GNWT-ECC looks forward to continued participation in NIRB's review. The GNWT is aware that NIRB intends to engage with the Mackenzie Valley Environmental Impact Review Board (MVEIRB) and Environmental Impact Review Board (EIRB) to facilitate a collaborative approach to the assessment of transboundary impacts. The GNWT is supportive of such collaboration.

Should NIRB or any participants have any questions about this submission, please contact Nathalie Oldfield, Manager, Environmental Impact Assessment by email at Nathalie_Oldfield@gov.nt.ca or by phone at 867-767-9233 ext. 53095.

Sincerely,



Nathalie Oldfield
Manager, Environmental Impact Assessment
Regulatory and Permitting Division
Department of Environment and Climate Change
Government of the Northwest Territories