



VIA EMAIL (info@nirb.ca)

July 16, 2025

Kelli Gillard
Manager, Impact Assessment
Nunavut Impact Review Board
PO Box 1360
Cambridge Bay, Nunavut X0B 0C0

**Re: NIRB Screening of MMG Resources Inc.'s "Izok Corridor Exploration Project"
Project Proposal
(NIRB File No: 25EN034)**

Dear Ms. Gillard,

Nunavut Tunngavik Inc. (NTI) is writing to provide its comments to the Nunavut Impact Review Board (NIRB) in response to the NIRB's invitation to provide it with comments regarding the screening of MMG Resources Inc.'s (MMG) "Izok Corridor Exploration Project" Project Proposal.

This submission is organized in the following order: (1) we will first outline NTI's roles in this NIRB process; (2) we will then discuss our understanding of the context of the project proposal, and (3) the nature of the documents submitted by the Proponent; and (4) finally, we will respond to the questions that the NIRB posed in its request for comment.

1. NTI's Roles

NTI's mission is to advance the economic, social, and cultural well-being of Nunavut Inuit. NTI represents Nunavut Inuit and safeguards Inuit rights recognized and affirmed by section 35 of the Canadian Constitution, including treaty and other Aboriginal rights, as well as those affirmed by the *United Nations Declaration on the Rights of Indigenous Peoples*.

NTI is the Designated Inuit Organization (DIO) under the *Nunavut Agreement* for the purpose of ensuring that the rights and obligations provided under the Agreement are fully implemented. In this regard, NTI works closely with the Regional Inuit Associations (RIAs) that exercise certain responsibilities as designated by NTI.

Kitikmeot Inuit Association (KitIA) is designated as the DIO administering the surface titles of the Inuit Owned Lands in the Kitikmeot Region. KitIA is also designated as the DIO for the negotiation of Inuit Impact and Benefit Agreements with proponents with respect to major development projects in the Kitikmeot Region.

NTI is the DIO under Article 5 of the *Nunavut Agreement*, which guarantees Inuit many rights with respect to wildlife harvesting and co-management. For example, under Section 5.6.1 of the *Agreement*, Inuit have the right to harvest wildlife to their full level of economic, social, and cultural needs when there is no total allowable harvest level established. NTI's role is to ensure that Inuit rights under Article 5 are recognized, implemented, and not infringed upon. NTI's role in ensuring the full implementation of Inuit rights set out in the *Agreement* also includes ensuring that Institution of Public Government processes are in keeping with the *Agreement* and respect Inuit participation and consultation requirements.

In this NIRB screening, NTI supports KitlA, recognizing KitlA as the primary DIO in the assessment of projects in the Kitikmeot Region by virtue of its designated responsibility on the management of the surface titles of the IOLs. Further, NTI supports KitlA, the Regional Wildlife Organization (Kitikmeot Regional Wildlife Board), the Hunters and Trappers Organizations (HTOs) and communities generally in addressing issues that are of concern to all Inuit in Nunavut including the promotion of Inuit culture and the safeguarding of Nunavut's wildlife, environment, culture, lands, and economy.

2. The Context of MMG's Application

NTI acknowledges that, as outlined in the NIRB's June 25, 2025 letter and in the project description submitted by MMG, similar or related projects have previously been examined by the NIRB. However, it is NTI's understanding that no substantive screening or review of the proposed activities has taken place for at least a decade (a review began in 2012 in NIRB file no. 12MN043 but it appears that no Impact Statement was ever produced/filed). It is also NTI's understanding that MMG has not carried out any exploration activities of the type proposed in the regions at issue since around 2014, and that the camps that are intended to be used have not been operational but rather have been in care and maintenance.

3. The Material Submitted by the Proponent

NTI has reviewed the material submitted by MMG, and in particular the proposed Wildlife Management Strategy (the "Strategy"). As will be discussed below, in NTI's view, the Strategy has significant flaws that must be remedied before any further action is taken with respect to this project.

The Strategy is dated 2011 and almost 15 years old. It (or at least part of it) also appears to be based on a document prepared for another purpose, since it refers to Wolfden as the project operator,¹ to project components that do not actually form part of the current project proposal,² and to annexes that do not exist.³ It refers to out-of-date data regarding wildlife populations,⁴ contains hyperlinks which no longer work,⁵ and identifies as contact persons individuals whom may be deceased.⁶ In several cases, it refers only to the "High Lake Project site", making it

¹ See p. 9 of the Strategy (**note: since the Strategy contains no page numbers, all references will be to the page number in the PDF navigation window**). It is NTI's understanding that Wolfden has not been involved with the project since around 2007.

² See, for example, references to "mill facilities" and "quarries" on p. 60, and reference to "tailings discharge area" on p. 75.

³ On p. 9 alone, there is a reference to a "Wildlife Mitigation and Monitoring Plan (Vol. 8, Sect. 2.2)" which does not exist for this project and to an "Appendix I: Wildlife Mitigation / Contingency Measures – Direct and Indirect Mortality from Attraction to Project Footprint" which also does not exist for this project. See also another reference to "Appendix I" on p. 28.

⁴ For example, on p. 7, the Strategy refers to a 2009 population estimate for the Bathurst caribou herd of approximately 32,000 individuals. However, at least three population surveys have been carried out since this time (2015, 2018, 2021) with the 2021 estimate being 6,243 adult caribou: see Jan Adamczewski *et al.*, "Estimates of Breeding Females & Adult Herd Size and Analyses of Demographics for the Bathurst Herd of Barren-Ground Caribou: 2021 Calving Photographic Survey", Government of Nunavut, 2022, available online: https://www.gov.nt.ca/ecc/sites/ecc/files/resources/326_manuscript.pdf.

⁵ See the links to Transport Canada documents on p. 30 and the link to a US Fish and Wildlife Service document on p. 31.

⁶ See the contact persons listed at the bottom of p. 57. It appears that Mr. Colin Adjun is deceased: <https://www.cbc.ca/news/canada/north/colin-adjun-the-fiddler-of-the-arctic-has-died-1.6273288>.

unclear whether the same or different policies are applicable or being used at the Izok camp.⁷ Most concerning, the Strategy makes no mention of the use of Inuit Qaujimagatuqangit, Indigenous knowledge, or community knowledge to assist in protecting workers and ensuring that the project disturbs wildlife as minimally as possible.

For these reasons, the Strategy proposed by the Proponent is insufficient as a mitigation measure and must, before any work is begun, be fully reworked to take account of the actual facts of the proposed project, up-to-date scientific information and mitigation measures, and information about the environment and wildlife populations gained from Inuit knowledge holders.

4. The Questions Asked by the NIRB

Below are the questions that the NIRB asked commentators to reply to, along with NTI's responses:

- Whether the project is likely to arouse significant public concern; and if so, why.
Answer: At present, NTI does not believe that this project raises significant public concern, assuming any adverse impacts on wildlife habitat or Inuit harvest activities can be properly mitigated.
- Whether the project proposal is likely to cause significant adverse eco-systemic or socioeconomic effects; and if so, why.
Answer: NTI believes that it is not possible to respond to this question based on the limited information regarding potential wildlife interactions that has been provided by the Proponent.
- Whether the project proposal is likely to cause significant adverse impacts on wildlife habitat or Inuit harvest activities; and if so, why.
Answer: NTI believes that it is not possible to respond to this question based on the limited information regarding potential wildlife interactions that has been provided by the Proponent.
- Whether the project proposal is of a type where the potential adverse effects are highly predictable and mitigable with known technology, (and providing any recommended mitigation measures).
Answer: NTI believes that an appropriate wildlife management and mitigation strategy must be produced before this question can be answered.
- Any matter of importance to the Party related to the project proposal.
Answer: NTI submits that if the NIRB decides that the project may be processed without review under Part 5 or 6 of the *Nunavut Agreement*, that it:
 - impose as a condition that work cannot begin until a new wildlife management study has been developed and approved by the NIRB, following review and opportunities for comments by the public and Inuit organizations;
 - not simply impose the terms and conditions that were attached to previous approvals, but instead review these terms and conditions in detail to ensure that they remain appropriate given the passage of time, the growing collection of Inuit

⁷ See, for example, p. 25, 27, 34, and 45.

Qaujimajatuqangit from other projects in the past 15 years, developments in scientific knowledge, and intervening development activities;

- require that a review of project impacts take place after two years to ensure that there are no unanticipated adverse impacts on wildlife.

In conclusion, NTI looks forward to working with KitlA and the NIRB to ensure that the appropriate balance is struck between development and the protection of Inuit lands and way of life. We thank the NIRB for its consideration of these comments.

Sincerely,



Dustin Fredlund
Chief Operating Officer