



<b>GN-01: Caribou Protection Measures</b>	
<b>Department</b>	Environment
<b>Organization</b>	Government of Nunavut (GN)
<b>Subject/Topic</b>	Wildlife Management Plan – Caribou Protection Measures
<b>References</b>	<ul style="list-style-type: none"> <li>• MMG Resources Inc. Project Description. Nunavut Impact Review Board: MMG 2025-2028 Izok Corridor Project – Exploration (May 2025)</li> <li>• MMG Resources Inc. MMG Slave Exploration: Wildlife Management Plan (November 2011)</li> </ul>
<b>CONCERNS</b>	
<p>The Government of Nunavut (GN) has identified concerns with MMG Resources Inc.'s (MMG or the Proponent) Wildlife Management Plan (WMP; MMG, 2011) for the Izok Corridor Project (the Project). The WMP, dated November 2011, is outdated and presents the following issues concerning caribou protection measures:</p> <ul style="list-style-type: none"> <li>• It is not consistent with other submission materials, such as Table 1 of the Project Description (MMG, 2025)</li> <li>• It lacks clear thresholds – such as caribou numbers, group composition, and proximity to project activities—that would trigger suspension of operations, including camps, drilling, surveys, and helicopter flights.</li> <li>• It does not adequately address the vulnerabilities of caribou during different seasons, including calving, post-calving, and summer.</li> <li>• It does not align with or exceed current caribou protection measures utilized by operating projects in Nunavut.</li> </ul> <p>In addition to the above, the GN notes that the caribou herding procedures described in Section 12 of the WMP state:</p> <p>“Deterrent actions taken to herd caribou should be based on the number of caribou, the potential for risk to wildlife or human safety, and the potential for interruption to construction, mining and operational activities.” (MMG, 2011, p.63)</p> <p>The GN does not support herding or deterring caribou to avoid delays to construction, drilling, blasting, surveying, or other project activities. Such actions should only be undertaken in exceptional circumstances when there is a legitimate risk to the safety of caribou or people.</p>	
<b>REQUEST(S) / RECOMMENDATION(S)</b>	

The GN recommends that the Proponent update the WMP to:

1. Ensure consistency with other submission materials
2. Specify thresholds—such as caribou numbers, group composition, and proximity to project activities—that would trigger suspension of operations (i.e., for camps, drilling, surveys, and helicopter flights).
3. Address the vulnerabilities of caribou during different seasons, including calving, post-calving, and summer.
4. At a minimum, align with or exceed current caribou protection measures utilized by operating projects in Nunavut.
5. Ensure that the caribou herding procedures do not allow for the herding of caribou for the purpose of the continuation of project activities.

#### **ADDITIONAL COMMENTS**

N/A