



NIRB File No.: 25EN034

Related to NIRB File No.: 12MN043 & 12YA007

Commission File No.: 150635

Related to Commission File No.: 149985 & 149834

July 22, 2025

Catherine Knight
 MMG Resources Inc.
 PO Box 91460, STN West Vancouver
 West Vancouver, BC
 V7V 3P1

Sent via email: catherine.knight@mmg.com

Re: Opportunity to address comments received regarding MMG Resources Inc.’s “Izok Corridor Exploration Project” proposal

Dear Catherine Knight:

On April 16, 2025, the Nunavut Impact Review Board (NIRB or Board) received a referral to screen MMG Resources Inc.’s “Izok Corridor Exploration Project” proposal from the Nunavut Planning Commission (Commission). On June 25, 2025, the NIRB circulated a public notice of the screening for this project, inviting interested parties to provide comments directly to the NIRB by July 15, 2025.

On or before July 15, 2025, the NIRB received comments from the following interested parties:

| Commenting Party | NIRB Doc ID No. |
|--|------------------------|
| Nunavut Tunngavik Inc. | 356694 |
| Kitikmeot Inuit Association | 356468 |
| Government of Nunavut | 356696 |
| Crown-Indigenous Relations and Northern Affairs Canada | 356490 |
| Environment and Climate Change Canada | 356466 & 356467 |
| Fisheries and Oceans Canada | 356479 |
| Transport Canada | 356276 |
| Government of Northwest Territories | 356504 & 356503 |

All comment submissions received by the NIRB relating to this project proposal can be accessed from the NIRB's online public registry at www.nirb.ca/project/126178 or by searching the public registry using the NIRB Document ID Nos. provided.

A *summary* of the public concerns reflected in the comment submissions relate to the following:

- Limited information provided regarding potential wildlife interaction with the proposed project and lack of current wildlife mitigation practices within management plans. Therefore, not possible to determine if the proposal may cause significant adverse ecosystemic or socioeconomic effects; or may cause significant adverse impacts on wildlife habitat or Inuit harvesting activities.
- Concerns that the proposed project in conjunction with other potential operations in the West Kitikmeot region has the potential to contribute to cumulative impacts; particularly on wildlife populations, habitat and Inuit land use. The importance of conducting an appropriate assessment level of the potential impacts from increasing mining and infrastructure development on wildlife populations is essential.
- Concerns that caribou herding procedures or deterring caribou would be used to allow for the purpose of the continuation of project activities. Such actions should only be undertaken in exceptional circumstances when there is a legitimate risk to the safety of caribou or people.
- Concerns with potential impacts to *Species at Risk Act* (SARA).
- Concerns regarding potential impacts within migratory bird habitats during nesting season.
- Management plans and contingency documents are outdated and need to be reviewed to reflect current environmental conditions or regulatory expectations.
 - As an example, the Wildlife Management Plan is dated 2011, refers to a different project operator with different project components that do not exist, refers to out-of-date data regarding wildlife populations, lack clear thresholds (caribou numbers, group composition, etc.) that would trigger suspension of operations, does not adequately address the vulnerabilities of caribou during different seasons, does not align with or exceed current caribou protection measures utilized by operating projects in Nunavut, contains outdated hyperlinks, identifies personnel who are not working for the organization, and do not mention the use of Inuit Qaujimagatuqangit, Indigenous knowledge or community knowledge.
 - Management Plans should be updated to ensure proper agencies are contacted regarding specific responsibilities.
 - The Waste Disposal Plan should be updated to ensure proper storage and handling of incompatible hazardous materials.
 - The Closure and Reclamation Plan should be updated to reflect the Proponent's commitment to carry out progressive reclamation of any components of the Project no longer required for operations.
 - The Spill Contingency Plan should be updated to ensure spill kits are appropriately equipped and readily accessible at all work sites, including exploration operations away from the camp.
- Works within navigable waterways are subject to the *Canadian Navigable Waters Act* and the Proponent would need to complete self-assessments of the navigability of all waterways where works would be occurring.

- Shippers preparing dangerous goods for shipment via air transportation must have International Civil Aviation Organization training.
- Prioritization of employment and training of Nunavut Inuit throughout the implementation of project activities.
- Meaningful and direct engagement with designated Inuit organizations should be conducted beyond the regulatory requirements. Continued consultation with the municipalities, the Hunters and Trappers Associations and any other relevant organizations or individuals is also recommended, along with transboundary organizations such as the Government of Northwest Territories, Department of Environment and Climate Change.

The NIRB would like to provide MMG Resources Inc. with an opportunity to address the comments noted above prior to the Board rendering its determination for this screening assessment and issuing its subsequent Screening Decision Report to the responsible Ministers. The NIRB respectfully requests that a response be provided directly to the NIRB by **August 5, 2025**.

If MMG Resources Inc. determines that the time required to supply a written response is significantly greater than two (2) weeks, the Board requests written notification and an anticipated date for submission be provided as soon as possible.

Please send any forthcoming submissions directly to the NIRB at info@nirb.ca, or through the online public registry at www.nirb.ca.

If you have any questions or require additional clarification, please contact the undersigned directly at kgillard@nirb.ca or at (867) 983-4619.

Sincerely,



Kelli Gillard PAg CTAJ
Manager, Impact Assessment
Nunavut Impact Review Board

cc: Distribution List
Sarah Hasek, MMG
Jennifer Dagdick, Stantec
Scott Trusler, Stantec

Elaine Little, Stantec
Richard Dwyer, Nunavut Water Board
Wynter Kuliktana, Kitikmeot Inuit Association
Cory Barker, Kitikmeot Inuit Association
Dustin Fredlund, Nunavut Tunngavik Inc.
Carson Gillis, Nunavut Tunngavik Inc.
Justin Buller, Government of Nunavut-Executive and Intergovernmental Affairs
Dianne Lapierre, Government of Nunavut-Economic Development & Transportation
Sean Joseph, Government of Nunavut-Economic Development & Transportation
Adrian Paradis, Canadian Northern Economic Development Agency
Tracey McCaie, Crown-Indigenous Relations and Northern Affairs Canada
Richard Bingley, Crown-Indigenous Relations and Northern Affairs Canada
Muhammad Arslan, Crown-Indigenous Relations and Northern Affairs Canada
David Abernethy, Crown-Indigenous Relations and Northern Affairs Canada
Kelvin Mok, Environment and Climate Change Canada
Eva Walker, Environment and Climate Change Canada
Cristina Ruiu, Environment and Climate Change Canada
José Audet-Lecouffe, Fisheries and Oceans Canada
Anna-Maija LaFlamme, Fisheries and Oceans Canada
Jackie Barber, Transport Canada
Nathalie Oldfield, Government of Northwest Territories