



July 22, 2025

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

Dear Kelli Gillard,

Reference: MMG Izok Corridor Project Mineral Exploration – Opportunity to Address Comments

MMG Resources Inc. (MMG) would like to express our appreciation to all the regulatory agencies for their comments and proposed recommendations. Additionally, for the sake of clarity, MMG would like to reiterate that the scope of the current application is to modify the spatial extent of two existing Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) Land Use Permits (LUPs) (issued July 2024) and two existing Nunavut Water Board (NWB) Water Licences (issued February 2023 and May 2023) that MMG holds in Nunavut. The modification of the LUP and NWB Water Licence boundaries is proposed to include CIRNAC mineral claims acquired in 2024 and 2025. Mineral exploration activities that will occur within these new CIRNAC mineral claims include geological mapping, geophysical surveys, surface sampling and exploration drilling using a heli-portable drill.

MMG submitted supporting documents that pertained to the original and current CIRNAC LUPs and NWB Water Licence submissions. As part of re-initializing the Izok Corridor Project in Nunavut, MMG is working on a phased approach to community engagement, mineral exploration, and project advancement. To support this process and reinforce our commitment to the Project, MMG has onboarded a new VP Canada and is actively evaluating and updating all existing management plans and developing additional plans that are necessary to support ongoing and future mineral exploration in Nunavut and will submit these plans to the NIRB public registry on or before August 5, 2025. MMG is committed to adhering to permit and licence conditions that are currently in place (CIRNAC LUPs and NWB Licences) and conditions that may also be provided through the project screening process by the NIRB. Permit conditions include progressive reclamation for drilling sites, waste management, wildlife management and timing restrictions, archaeological and palaeontological terms and conditions, petroleum fuel storage requirements, water use, waste disposal, drilling operations, spill contingency and closure and reclamation.

MMG offers the following responses to the comments and recommendations provided by each regulatory agency:

Transport Canada (Jackie Barker)

Comment and Recommendation Overview

- Project noted to include water withdrawals and transport of dangerous goods
- Recommendation to complete a self-assessment of the navigability of all waterways where water intakes will be placed to determine applicable regulatory requirements for water intakes
- Reminder that shipper preparing dangerous shipments for air transportation via helicopter must have International Civil Aviation Organization (ICAO) training for dangerous goods and must meet requirements of the Transportation of Dangerous Goods Regulations

Response

MMG acknowledges these requirements and commits to following applicable regulatory requirements. The requirements for water intakes to be minor works will be reviewed and the Project Review Tool will be employed as required. The shipment of dangerous goods will be in accordance with the Transportation of Dangerous Goods Regulations.

Kitikmeot Inuit Association (KitIA; Cory Barker)

Comment and Recommendation Overview

- Potential to contribute to cumulative impacts, particularly on wildlife populations, habitat and Inuit land use
- Reliance on management plans and contingency documents that may not reflect current environmental or regulatory expectations, including:
 - o Wildlife Management Plan
 - o Spill Contingency Plans
- KitIA recommends review and update of documents to reflect current conditions and Inuit knowledge to mitigate potential impacts
- Emphasizes importance of meaningful, direct engagement between MMG and KitIA, to discuss project design and potential effects

Response

MMG recognizes the importance of engagement with stakeholders and will be conducting engagement activities commencing this August with regular continuing consultation. Engagement activities will include community members, Hamlet offices, KitIA, Nunavut Tunngavik Incorporation (NTI), local Hunters and Trappers Associations (HTOs) and regulatory agencies. Topics of engagement will include current and future MMG exploration and mining plans, exploration activities and schedules, cumulative impacts on the environment including wildlife and especially caribou mitigation measures, Inuit knowledge and socioeconomic topics.

MMG appreciates the importance of management and contingency plans and commits to a careful review and update of the plans to reflect current conditions, updated scientific information and mitigation measures. MMG looks forward to KitlA's input with respect to Inuit knowledge and collaboration on management plans.

Government of the Northwest Territories – Environment and Climate Change (GNWT-ECC; Nathalie Oldfield)

Comment and Recommendation Overview

- Recommends updating Wildlife Management Plan:
 - o Incorporate current wildlife mitigation practices and include relevant recommendations from existing range plans for caribou herds within the project area
 - o Update project map of caribou herd distributions, including the Bathurst, Dolphin and Union caribou herds
 - o Removal or revision of references to “procedures for caribou herding”
 - o Clear definitions of what constitutes a “large herd” in the context of caribou and/or group size thresholds to inform mitigation procedures
 - o Inclusion of the “high-altitude reconnaissance survey” referenced in the 2025 Project Description
- Engagement with GNWT-ECC to incorporate regularly updated GPS caribou collar mapping information into exploration operations

Response

MMG appreciates the importance of management and contingency plans and commits to a careful review and update of the Wildlife Management Plan to reflect current conditions for caribou herds, updated scientific information and wildlife mitigation measures. MMG has begun engagement with GNWT-ECC to establish an Information Release Agreement that facilitates access to GPS caribou collar maps and will incorporate this information into exploration program planning.

Environment and Climate Change Canada (ECCC; Kelvin Mok)

Comment and Recommendation Overview

- Species at Risk (SAR):
 - o Recommends consulting the Species at Risk registry to obtain the most current information for operations
 - o Recommends consulting the Government of Nunavut to identify appropriate mitigation and/or monitoring measures to avoid and lessen project effects to species under their management responsibility

- Species at Risk – SAR Missing and/or Effects and Measures Missing:
 - o Recommends identification of adverse effects of the Project on the species at risk likely to be affected and their critical habitat
 - o Implement measures to avoid or lessen adverse effects and monitor them to inform adaptive management
 - o Updating mitigation and monitoring measures to be consistent with applicable species at risk Recovery Strategies and Action Plans or Management Plans
 - o Monitoring should include recording the timing and location of observed species at risk, their behaviour when encountered, and actions taken to avoid disturbance to the species, its habitat and/or its residence
 - o Submit monitoring reports to the appropriate regulators and organizations with management responsibility for that species
- Activities within Migratory Bird Habitat Project; Project Activities During Nesting Season:
 - o Implement Project activities in a manner that reduces risk to migratory birds and avoid harming, killing or disturbing migratory birds or destroying, disturbing or taking their nests and eggs
 - o Avoid conducting potentially destructive or disruptive activities at key locations or during key periods to avoid negative impacts to migratory birds
- ECCC Contact Information:
 - o Identify ECCC as a contact for instances involving migratory birds in instances involving:
 - Interactions and incidents involving the potential disturbance of individuals or nests and any mortality events of these species
 - Updates to Wildlife Management Plan and Monitoring Plans, or their equivalents, in relation to these species
- Spill Prevention of Parked Vehicles and Heavy Machinery:
 - o Include oil-absorbent booms in all drill spill kits to enable rapid response to spills occurring on or near water
 - o 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

Response

MMG will update the Wildlife Management Plan to incorporate the most current information about species at risk and their critical habitat. MMG appreciates inclusion of the table of species at risk in the attachments. MMG will follow the *Migratory Birds and Convention Act* (MBCA) (1994) and the Migratory Birds Regulations and will also engage with the Government of Nunavut

to collaborate on appropriate mitigation and monitoring measures with respect to species at risk. MMG commits to following applicable MBCA recommendations to avoid harming, killing, or disturbing migratory birds or destroying, disturbing, or taking the nests or eggs of migratory birds. MMG will incorporate the Guidelines to Avoid Harm to Migratory Birds into the wildlife management plan. Additionally, ECCC will be included in the Wildlife Management Plan as a contact regarding interactions and incidents involving migratory birds or their nests.

The spill response plans will be updated to reflect recommendations made by ECCC. MMG can confirm these measures are currently in use at MMGs exploration camps.

Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC; Richard Bingley)

Comment and Recommendation Overview

- Fuel, Hazardous Materials and Waste: storage of large quantities of fuel and hazardous materials at multiple Project sites
 - o Recommends separate storage of incompatible hazardous materials
 - o Recommends updates to waste disposal plan
- Closure and Reclamation: application does not describe plans for closure and reclamation of temporary work sites and facilities
 - o Recommends MMG confirms their commitment to carry out progressive reclamation of any components of the Project no longer required for operations, including drill holes, drill cuttings, disposal sites, temporary access roads, etc
- Cumulative, Induced, and Transboundary Environmental Impacts
 - o Recommends assessment of the following:
 - Potential cumulative impacts of increasing mining and infrastructure development in the region
 - Cumulative impacts on caribou herds
 - Transboundary issues
- Consultation with Interested Parties
 - o Recommends continued consultation with stakeholders on several issues
- Employment and Training Opportunities for Nunavut Inuit
 - o Recommends prioritization of employment and training of Nunavut Inuit throughout implementation of Project activities

Response

MMG appreciates the importance of Management and Contingency Plans and commits to providing a Waste Management Plan that also incorporates measurements to store incompatible hazardous materials in separate, labelled, secured containment areas.

MMG's NWB Water Licence renewal in 2023 included an updated Closure and Reclamation Plan (CRP). The CRP outlines three site closure scenarios – long term care and maintenance, seasonal closure and final closure. This will be reviewed and revised to reflect the current exploration program and submitted to the NIRB. Following 2024 CIRNAC inspections of the High Lake, Ham Lake, and Hood camp sites, MMG noted their commitment to closure and restoration of all drill holes and disturbed areas upon final closure of exploration tenements. At that time, MMG has committed to full restoration of historic disturbance confirming historic drill casings will be cut at or below ground level and covered with soil as MMG may utilize the drill rods stockpiled on site during exploration activities. Consistent with our ongoing reclamation and restoration, MMG will

close new drill sites following the removal of each drill rig, in accordance with the conditions outlined in the CIRNAC LUPs and NWB Water Licences.

MMG recognizes the importance of engagement with stakeholders and will be conducting engagement activities commencing this August with regular continuing consultation. Engagement activities will include community members, Hamlet offices, KitlA, the NTI, local HTOs and regulatory agencies. Topics of engagement will include current and future MMG exploration and mining plans, exploration activities and schedules, cumulative impacts on the environment including wildlife and especially caribou, mitigation measures, Inuit knowledge and socioeconomic topics.

MMG is committed to sourcing Project personnel, materials and services from Kitikmeot communities and offers on-the-job training as required. MMG is currently employing two local Inuit and supports local community initiatives, with plans to employ a local community relations person in the coming months, as well as temporary employment of wildlife monitors to support field mapping and archaeology programs. Direct and indirect employment associated with the program is anticipated to expand as the project progresses and develops.

Fisheries and Oceans Canada (DFO; Anna-Maija LaFlamme)

Comment and Recommendation Overview

- DFO acknowledges the proponent will be following DFO's Interim Code of Practice: End-of-pipe fish protection screens for small water intakes in Freshwater Intakes

Response

MMG appreciates DFO's review and comment.

Nunavut Tunngavik Inc. (NTI; Dustin Fredlund)

Comment and Recommendation Overview

- The Wildlife Management Strategy (Strategy) submitted has significant flaws that must be remedied:
 - o Strategy is dated 2011 (almost 15 years old)
 - o Document reflects other projects (Wolfden) and refers to annexes that do not exist
 - o Refers to out-of-date data and irrelevant contact information
 - o No use of Inuit Qaujimagatuqangit, Indigenous knowledge or community knowledge in wildlife management strategy

Response

MMG appreciates the comments and would like to take the opportunity to clarify that the scope of the current application is to modify the spatial extent of two existing CIRNAC LUPs (issued July 2024) and two existing NWB Water Licences (issued February 2023 and May 2023) for mineral exploration activities on CIRNAC mineral claims that were acquired in 2024 and 2025, outside the current CIRNAC LUP and NWB Water Licence boundaries. While mine development

is a potential future activity that may be undertaken by MMG in the future, mine development (NIRB reference file no. 12MN043) or other intensive activities are not part of this NIRB screening.

As outlined above, MMG appreciates the importance of management and contingency plans and commits to a careful review and update of the Wildlife Management Plan to reflect current conditions, updated scientific information and wildlife mitigation measures.

MMG also recognizes the importance of engagement with stakeholders and is currently organising engagement activities commencing this August with regular continuing consultation. Engagement activities will include community members, Hamlet offices, KitIA, NTI, local HTOs and regulatory agencies. Topics of engagement will include current and future MMG exploration and mining plans, exploration activities and schedules, cumulative impacts on the environment including wildlife and especially caribou, wildlife mitigation measures and potential impacts, inclusion of Inuit Qaujimaqatugangit, Indigenous knowledge and community knowledge in Wildlife Management Strategy and socioeconomic topics.

Yours sincerely,



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