

11th October 2021

Nunavut Planning Commission
P.O. Box 2101
Cambridge Bay, Nunavut X0B 0C0

Attn: Jonathan Savoy

Dear Jonathan,

2021 Draft Nunavut Land Use Plan (DNLUP) – MMG Resources feedback

MMG has reviewed the 2021 Draft Nunavut Land Use Plan (DNLUP). We were encouraged to see that Section 5.3 recognizes the importance of linear infrastructure to access the natural resources of the Nunavut Settlement Area and the acknowledgement that there are no roads or rail lines connecting Nunavut communities to each other or to the rest of Canada. We were also encouraged to see that two proposed linear infrastructure corridors (Kivalliq-Manitoba and Mary River-Milne Inlet) have been formally recognized as Limited Use Areas that provide certainty to the proponents of these projects.

In 2012, following a positive conformity determination by Nunavut Planning Commission (NPC), MMG submitted the Izok Corridor project proposal to the Nunavut Impact Review Board (NIRB) and in the 2013 the Minister of Aboriginal Affairs and Northern Development referred the Project to the NIRB for a review under Part 5, Article 12 of the Nunavut Land Claims Agreement (NLCA). This project proposal includes an all-weather road connecting the proposed Izok and High Lake mines to a proposed deep-water port at Grays Bay. Previous drafts of the Nunavut Land Use Plan have recognized this road and port infrastructure as a 'proposed transportation corridor' and presented it as a map notation (2014) and as a terrestrial valued component (2016). In the 2021 draft plan, neither this proposed road corridor nor the proposed deep-water port are depicted on the maps.

It is noted that the proposed road alignment for the Grays Bay Road and Port project is included as 'Existing and Potential Linear Infrastructure' on Map B2 within the Valued Socio-Economic Components map series included in Appendix B of the draft plan document and is represented as a single line on the associated map.

We have also examined the existing rights provisions in Appendix A and we note that MMG Resources Inc. and the 'Izok Corridor' is identified as #23. However, the associated map depicts the Izok property but does not depict the associated road and port infrastructure needed to connect the Izok and High Lake mine sites to the deep-water port at Grays Bay. We further note the following restriction under clause 6.1.8-6, "The construction of permanent all-season linear infrastructure in an area outside of the footprint of a project identified in Appendix A is not authorized if that type of project is prohibited in that area".

MMG is concerned that the information included in the Draft Nunavut Land Use Plan has omitted important infrastructure that is integral to the development and operation of the Izok Corridor Project. MMG respectfully requests that the alignment of the proposed all-weather road and the footprint of the proposed

deep-water port associated with the Izok Corridor Project be included in a land use designation that confirms this proposed infrastructure is in conformity with the 2021 Draft Nunavut Land Use Plan.

Please don't hesitate to contact the undersigned if any questions

Yours sincerely

A handwritten signature in blue ink that reads "Mario Car". The signature is fluid and cursive, with the first name "Mario" and the last name "Car" clearly distinguishable.

Mario Car
Group Manager – Project Services
MMG Ltd