

May 9, 2023

Richard Dwyer
Manager of Licensing
Nunavut Water Board
PO Box 119
Gjoa Haven, NU
X0B 1J0

**RE: MMG Response to Comments on Application to Renew and Amend Water Licence
2BE-IZO1823**

Dear Mr. Dwyer,

MMG Resources Inc. (MMG) thanks Environment and Climate Change Canada (ECCC) and Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) for their review and comments on MMG's application for renewal with amendment of water licence 2BE-IZO1823 (the Licence) for the Izok Project (the Project).

MMG also thanks the Nunavut Water Board (NWB) for the opportunity to respond to the comments submitted. Please see MMG's responses below.

Should you have any questions or concerns please contact Sarah Hasek, Tenement Officer, MMG Resources Inc. sarah.hasek@mmg.com Ph: 604-358-8155, who is the MMG representative regarding this renewal.

Regards,



[Mario Car \(May 15, 2023 14:30 CDT\)](#)

Mario Car

Head of Projects, MMG Ltd.
mario.car@mmg.com

ECCC-1: Open Burning and Incineration

ECCC Comment:

The Closure and Reclamation Plan discusses the use of incineration and open burning for onsite waste management. ECCC acknowledges that the use of open burning of appropriately segregated wastes is in accordance with guidance from the Government of Nunavut. However, ECCC discourages the practice of open burning as it can result in the release of toxic substances (e.g., dioxins/furans, mercury, heavy metals) to the environment. Controlled incineration that minimizes contaminant releases would be more protective of the environment.

Although the Closure and Reclamation Plan describes an on-site incinerator, the plan does not indicate whether ECCC's waste incineration document has been consulted to support best practices.

ECCC Recommendation:

ECCC recommends the following regarding open burning and incineration:

- I. Prioritize waste management practices that minimize or eliminate the use of open burning to the extent practicable; and
- II. Consult ECCC's publication "Technical Document for Batch Waste Incineration" for guidance regarding waste incineration to inform waste management practices and relevant plans.

MMG Response:

MMG thanks ECCC for their comments and guidance.

- I. MMG confirms that they will prioritize waste management practices that reduce the use of open burning to the extent practicable and will adhere to the GNWT's document "Municipal Solid Wastes Suitable for Open Burning".
- II. MMG will verify their incineration waste management practices align with ECCC's "Technical Document for Batch Waste Incineration".

CIRNAC-1: Open Burning and Incineration

CIRNAC Comment:

CIRNAC notes that the Licensee requests to renew the license without partitioning water use allocation between "drilling" and "domestic" use while keeping the total water allotment and activities consistent with the current authorization. This may increase water use for the camp operation and generate more waste. The previous waste disposal plan is dated October 2012, CIRNAC recommends that the Licensee update and submit a waste disposal plan under the renewed licence.

CIRNAC Recommendation:

The previous waste disposal plan is dated October 2012, CIRNAC recommends that the Licensee update and submit a waste disposal plan under the renewed licence.

MMG Response:

Although greywater quantities may increase the waste management principles practiced at site remain applicable. These include employment of a kitchen grease trap and discharge of greywater (including kitchen, bathing, sink and laundry water) to a sump for natural attenuation. MMG will review the Izok Waste Disposal Plan prior to resumption of camp operations to ensure no further updates are needed.