

**NUNAVUT PLANNING COMMISSION**  
**PUBLIC HEARING ON THE 2016 DRAFT NUNAVUT LAND USE PLAN**

**BAFFINLAND IRON MINES**  
**PRE-HEARING WRITTEN SUBMISSIONS**

January 13, 2017

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## 1 Background and Objectives

Baffinland Iron Mines Corporation (Baffinland) is pleased to participate in consultation on the Draft Nunavut Land Use Plan (DNLUP).

Baffinland is a Canadian mining company that operates the Mary River iron ore mine, located in the Qikiqtani Region of Nunavut on Baffin Island. The Project is authorized to mine up to 22.2 million tonnes per annum (mtpa) of iron ore and to transport up to 18 mtpa of iron ore to market by the Southern Transportation Corridor and Shipping Route and to transport up to 4.2 mtpa of iron ore to market by the Northern Transportation Corridor via the Northern Shipping Route.

## 2 General Comments and Recommendations

Baffinland agrees with the overall goals of the DNLUP and shares the vision that creating Sustainable Economic Development can be achieved while also Protecting and Sustaining the Environment, and Building Healthier Communities. Baffinland is committed to conducting all aspects of our business in accordance with the principles of sustainable development and corporate responsibility and always with the needs of future generations in mind.

## 3 Specific Comments and Recommendations

Baffinland submits the following specific comments, analysis and recommendations regarding the DNLUP for consideration.

### 3.1 Issue #1 – Existing Transportation Corridors

#### 3.1.1 Reference in DNLUP

Section 1.7.2 – Nunavut Land Use Plan Content

Section 5.5.1.1 – Planning for Linear Infrastructure

Schedules A and B

#### 3.1.2 Comment

There is potential for confusion with how the two Mary River Transportation Corridors are shown on the two Schedules. Schedule A currently shows the corridor between the mine site and Milne Port as an Existing Transportation Corridor and Schedule B shows the south rail between the Mine Site and Steensby Port as a Proposed Transportation Corridor but both should be designated as Existing Transportation Corridors.

#### 3.1.3 Recommendation(s)

In order to ensure consistency and completeness, Baffinland recommends that the two approved transportation components of the Mary River Project be included on both the Land Use Designations figure (Schedule A) and on the Valued Components of Nunavut figure (Schedule B). This would include the Transportation Corridor between the Mine Site and Milne Inlet shown on Schedule A also be shown on Schedule B and that the Transportation Corridor between the mine site and Steensby shown on Schedule B also be shown on Schedule A.

### 3.1.4 Rationale

As part of the Mary River project development, Baffinland requested that amendments be made to the North Baffin Regional Land Use Plan (NBRLUP) for two transportation corridors:

- A Southern Transportation Corridor that would connect the Mary River Mine site with a proposed port at Steensby, and
- A Northern Transportation and Shipping Corridor that would connect the Mary River Mine site with the port at Milne Inlet along the route of the traditional Tote Road.

With respect to the Southern Transportation Corridor, per their correspondence of Dec. 9, 2013, the NPC has determined that in accordance with the NLCA and the NBRLUP that an amendment to include the "transportation Corridor" in the NBRLUP is necessary and therefore recommended an amendment. The Southern Transportation Corridor located outside of the NBRLUP has been approved by the NIRB, as per Project Certificate No. 5, and so is an "Existing Use". The Southern Transportation Corridor has been approved by NPC and NIRB and should be included in the NLUP as an Existing Transportation Corridor.

### 3.1.5 Supporting Material

NBRLUP Appendix P, Amendment No. 1 Mary River Mine Site Transportation Corridor

NBRLUP Appendix Q, Amendment No. 2 Milne Inlet Tote Road and Marine Transportation Corridor

Correspondence Regarding Amendment No. 1 to the NBRLUP provided on the NPC website at [http://www.nunavut.ca/en/approved\\_plans/amendments](http://www.nunavut.ca/en/approved_plans/amendments) .

## 3.2 Issue #2 – Highways and Railways Requiring a Plan Amendment

### 3.2.1 Reference in DNLUP

#### 5.5.1.2 – Terrestrial Transportation, Communication and Other Linear Infrastructure Corridors.

Figure 8: Terrestrial Linear Infrastructure Corridor Conformity Determination

### 3.2.2 Comment

Section 5.5.1.2 notes that “all applications for highways and railways will require a plan amendment, due to a high potential for significant socio-economic effects from connecting communities”. This planning concern identified applies to passenger railways that connect people and goods between communities but is not applicable in cases where railways are used for freight movement and do not connect communities.

Baffinland notes that mining projects often involve the development of freight railways that are used for the bulk shipments of ore within the mining facility or between the mining facility and an associated port facility. Development of a ‘Freight Railway’ would not have the same impact as a ‘Passenger Railway’ and should not be subject to the requirement for a mandatory plan amendment.

### 3.2.3 Recommendation(s)

Baffinland recommends that the DNLUP distinguish between ‘Passenger Railways’ that are used to move people and connect communities and ‘Freight Railways’ that are used for the movement of materials. This is similar in concept to the distinction between ‘Highways’ which are for general use between communities, ‘Public Roads’ which are not built between communities, and ‘Mine Bulk Hauling Roads’ and ‘Mine Servicing Roads’ which are used for local mining activities.

We do not agree that all applications and railways should require a plan amendment. The NIRB is well placed to evaluate the potential for socioeconomic impacts from project such as highways and railways. As such, we recommend the following revision to 5.5.1.2: “all applications for highways and railways will require a ~~plan amendment~~ NIRB screening, due to a high potential for significant socio-economic effects from connecting communities”.

If this revision is not accepted, we submit that the NLUP should distinguish between industrial and passenger railways as follows: “all applications for highways and passenger railways will require a plan amendment, due to a high potential for significant socio-economic effects from connecting communities”.

In addition, the text in Figure 8: should also be revised to state “Is part or all of the proposal within one or more Protected Areas, and/or is the proposal for a Highway or Passenger Railway?”