



October 2<sup>nd</sup>, 2017

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Serving the  
communities of

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Pond Inlet

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Resolute Bay

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Sanikiluaq

Mr. Tommy Owljoot,  
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Mr. Goump Djalogue,  
Nunavut Planning Commission,  
P.O. Box 1797,  
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Mr. Owljoot and Djalogue,

**RE: NPC August 31, 2017 Request for Comments, Baffinland Iron Mines Corporation Request to Amend the North Baffin Regional Land Use Plan (NBRLUP).**

The Nunavut Planning Commission (NPC) recently issued a request for comments on the Proposed Plan Amendment by Baffinland Iron Mines Corporation with a submission deadline of October 2<sup>nd</sup>, 2017. <sup>1</sup> The Qikiqtani Inuit Association (QIA) is responding to NPC's request for comments as a Regional Inuit Association, and organization with Designated Inuit Organization status under the Nunavut Agreement.

In its request for comments, Proposed Plan Amendment by Baffinland Iron Mines Corporation (August 31st, 2017), the NPC requested that parties respond to three key points:

- Your concerns, comments and/or support of the proposed amendment and provide all relevant information to the NPC
- Do you want an in-person public hearing, and if so, why; and
- Your preferred language, and your contact information, which may be made public.

In its request for comments, NPC has stated that issues NPC will consider include: does “*the amendment Application*” meet referenced information requirements? Should NBRLUP, Appendix Q, include a railway? Is adding icebreaking to the marine transportation corridor consistent with NBRLUP, Appendix Q?

### Summary of QIA Submission Recommendations

Of importance to QIA are two statements by NPC in its request for comments: firstly, that the Commissioners will decide if a public hearing is necessary based on submissions received; and secondly, that Commissioners may accept or revise the amendment and submit it for approval with or without a hearing. QIA submits that one (1) public hearing in Pond Inlet is required. Given the level of community and public concern expressed regarding the proposed amendment, it would be inappropriate for the

<sup>1</sup> Nunavut Planning Commission, Public Distribution List: Proposed Plan Amendment by Baffinland Iron Mines Corporation. August 31<sup>st</sup> 2017.







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BIMC has also stated that the existing 10 km terrestrial corridor generally along the Milne Inlet Tote Road should be amended to include permitted use for a railway component, partly based on the proposed new draft Land Use Plan which states that such corridors “can be multi-modal” in their use. While QIA generally accepts the idea of “multi-modal” use, it is not clear to QIA whether the existing public easement created by the Nunavut Agreement over Inuit Owned Lands for a public road is consistent with the specific mixed use, in this case public use of a roadway, active mine use of a road way and the development and use of a railway within the same general area. Furthermore, it is not clear if “multi-modal” use is intended to entail two distinct and potentially incompatible pieces of linear infrastructure when also recognizing the existence of a public access easement. Furthermore, QIA notes that the Draft Nunavut Land Use Plan (2016 Draft) describes a Linear Infrastructure Corridor (LIC) as:





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