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Serving the
communities of

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Cape Dorset

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Resolute Bay

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Sanikiluaq

December 12, 2017

Nunavut Planning Commission
626 Queen Elizabeth Road (Tumiit Plaza)
P.O. Box 1797
Iqaluit, NU X0C 0H0

Dear Sirs,

Re: QIA Supplementary Submissions – Mary River – Baffinland Iron
Mines - Application to Amend the North Baffin Regional Land Use Plan

Following the public hearing in Pond Inlet, December 4th and 5th, 2017 parties were invited to provide Supplementary Submissions (if any) to NPC on or before December 12, 2017. QIA has two supplementary submissions.

Information Gaps

Since the date of QIA's written submissions, QIA has noted that NIRB filed its letter of November 30, 2017 with NPC, therein indicating its conclusion that: *"the majority of the specific information required by Appendices J and K of the NBRLUP that could reasonably be expected to be provided at this stage in the process has been provided."* QIA also notes that NIRB agrees with QIA's submission that much more detailed information will be required at NIRB.

To assist NIRB with review of the Phase 2 application, QIA submits that NPC should provide NIRB with a summary of the community concerns that arose during NPC's public review process, and in particular at the public hearing in Pond Inlet. NPC should also give direction on any specific gaps in information it has identified that, while possibly not required for NPC's purposes, will clearly require attention by Baffinland at NIRB to respond to community concerns.

Community Benefits

During the public hearing QIA responded to concerns raised by some, including Commission Staff Member Brian Aglukark, about the use of royalties from the Mary River project. QIA indicated that further information would be provided.

As a Designated Inuit Organization under the Nunavut Agreement QIA is legally obligated to perform multiple public functions on behalf of Inuit. This

includes automatic standing to present the views and concerns of Inuit to Institutions of Public Government (IPGs) during regulatory proceedings. It also includes management under the Nunavut Agreement of Inuit water rights (Article 20), wildlife compensation (Article 6), Inuit Owned Lands (Article 21), and negotiating and implementing Inuit Impact and Benefit Agreements under Article 26.

QIA strives to balance Inuit interests in environmental protection with advantageous outcomes for Inuit. The role of QIA (or for that matter any regional DIO) under the Nunavut Agreement is to balance assessed impacts of project plans on Inuit and Inuit rights with the economic and financial benefits that can be gained for Inuit. This includes Inuit employment, contracting for Inuit business and the wise use of royalties from major projects like Mary River for Inuit.

QIA is proud to be the first Inuit Organization in Nunavut to have royalty benefits within an IIBA. All royalty payments received by QIA from the Mary River IIBA have been set aside in a Legacy Fund to ensure availability to future generations of Inuit. Under QIA's by-laws it is impossible for QIA to terminate the Legacy Fund or avoid contributing to the Legacy Fund future amounts received without public notice and participation of Inuit beneficiaries in the communities. All interest and revenue earned on the Legacy Fund may only be used to finance direct programs delivered to Inuit. No part of the capital of the Legacy Fund can be touched by QIA. Therefore, royalty payments cannot be used by QIA for other purposes.

To support this system of planning, QIA developed a Benefits Fund, this fund receives payments from the Legacy Fund and is managed to deliver benefits to Inuit. In creating the Benefits Fund, QIA asked Inuit about their priorities for revenue generated by the Legacy Fund. The priority areas identified were children and culture. QIA is now implementing programs that include daily daycare subsidies to all parents of Inuit children, the production of children's Inuit language materials and community-based land and sewing activities.

QIA continues to implement policies and procedures for the responsible use of revenues from the Legacy Fund, and remains committed to the re-investment of all Mary River royalties back into the communities. In 2018, the Legacy Fund will provide close to \$1.5 million, an amount that is set to grow each year. The Legacy Fund will continue to provide benefits to future generations of Inuit after the Mary River project is gone. These are in addition to annual funding of \$250,000 for a business capacity and start-up fund and \$750,000 for the Ilagiktunut fund for community-led initiatives in communities affected by the Mary River project.

QIA is accountable and transparent. Each year our Annual Report outlines the programming and funding made available to Inuit. As well, our Board of Directors reviews and approves our consolidated financial statements. QIA's Board is made up of representatives from each of the Qikiqtani communities.

The ongoing success of the Mary River project is measured by QIA against employment, training and contracting of Inuit, as well as the management and mitigation of impacts to the environment. These are issues raised by Inuit in

affected communities as well. QIA always places the views of Inuit at the forefront of its work on Mary River. QIA expends a considerable amount of its own resources to monitor progress and, as required, pursue Baffinland for compliance with its IIBA, appropriate participation in regulatory proceedings, and other obligations to Inuit.

QIA has raised other important issues, such as caribou protection, in its written submissions filed on November 17, 2017. We trust the sufficiency of those submissions and invite the NPC to consider them as it reviews the current application.

Yours Sincerely,



Stephen Williamson Bathory
Director
Major Projects

