



February 14, 2014

Nunavut Planning Commission
PO Box 2101
Cambridge Bay NU X0B 0C0

Attention: Sharon Ehaloak, Executive Director

Draft Nunavut Land Use Plan

Dear Ms. Ehaloak,

Thank you for the opportunity to submit Baffinland Iron Mines Ltd. ("**Baffinland**")'s initial written comments on the Draft Nunavut Land Use Plan ("**DNLUP**"). Our understanding is that as per the April 2013 "A Guide for Engagement Document," the Nunavut Planning Commission ("**NPC**") will continue to receive and consider written comments on the DNLUP until April 11, 2014. Baffinland may submit additional written comments on the DNLUP in the interim.

Baffinland has reviewed the submissions to the NPC made by NWT and Nunavut Chamber of Mines on February 6, 2014, and is supportive of them. Based on our review of the DNLUP, we provide the following comments, organized by section number.

Definitions

Marine shipping is an essential component of the development of the Mary River Project. While the definition of "transportation corridor" includes marine shipping routes, it is not currently clear how these areas are meant to be addressed in the DNLUP. Generally, further clarity with respect to the issue of marine shipping is required.

3 Encouraging Conservation Planning

Baffinland has reviewed and agrees with the specific comments made by the NWT and Nunavut Chamber of Mines relating to Section 3.1.1.3 ("National Marine Conservation Areas – Lancaster Sound") and Section 3.1.1.2. ("Migratory Bird Sanctuaries").

4.2.1 Transportation Infrastructure

Baffinland has reviewed and agrees with the specific comments made by the NWT and Nunavut Chamber of Mines relating to this section.

7.2 Cumulative Impact Referrals

In this section, the NPC has noted that as per the NLCA, generally activities identified in Schedule 12-1 of the NLCA are exempt from screening by the Nunavut Impact Review Board ("**NIRB**"), unless the NPC refers such applications to the NIRB where the NPC has concerns with respect to the cumulative impacts of a Project Proposal in relation to other development activities. This section would be enhanced if it provided more detail with respect to NPC procedure and considerations relating to such determinations.

7.8 Legal Non-Conforming Uses

Baffinland suggests that activities that are covered by an existing permit or approval, as that may be amended or renewed from time to time, should be deemed to be an “existing use of land”.

Table 1 – ESED-1 Designation

Baffinland suggests that for areas in the ESED-1 Designation, no distinction need be drawn between production mines and advanced exploration projects.

Thank you for the opportunity to submit our initial comments on the DNLUP. If you have any questions or would like to discuss these further, please do not hesitate to contact me directly.

Sincerely,

A handwritten signature in dark ink, appearing to read 'O. Curran', with a stylized flourish at the end.

Oliver Curran
Director Sustainable Development