



Thursday, July 20, 2017

Mr. Andrew Nakashuk
Chairperson, Nunavut Planning Commission
P.O. Box 1791
Iqaluit, Nunavut X0A 0H0

The Honorable Carolyn Bennett
Indigenous and Northern Affairs Canada
Terrasses de la Chaudière
10 Wellington, North Tower
Gatineau, Quebec K1A 0H4

RE: Mary River Phase II, Application to Amend the North Baffin Regional Land Use Plan

The Qikiqtani Inuit Association (QIA) and Nunavut Tunngavik Inc. (NTI) are writing to present our views on the request filed by Baffinland Iron Mines Corporation (BIMC) to amend the North Baffin Regional Land Use Plan (NBRLUP) as filed with the Nunavut Planning Commission (NPC) on March 17, 2017.

The Mary River Project is located upon Inuit Owned Lands and is currently one of a handful of active mining projects in Nunavut, and the only operating project in the Qikiqtani region. Since the initial project plan was presented in March 2008, QIA has participated in every aspect of the review and approval of the Mary River Project and has been a stalwart advocate for the processes established under the *Nunavut Agreement*. Having reviewed recent correspondence presented by both BIMC and NPC, QIA and NTI are taking this opportunity to address issues associated with the current status of BIMC's request to amend the NBRLUP.

QIA and NTI request that the NPC initiate a review by the Commissioners of the amendment application forthwith, consistent with the *Nunavut Planning and Project Assessment Act* (NuPPAA) 59 (2) and the *NPC Internal Procedure on Amendments to Land Use Plans* ("NPC Internal Procedure") 4.7 (c).

QIA and NTI also urge the NPC and the Minister of INAC to provide certainty and clarity as to next steps as soon as possible. Concerns have been expressed that the request for amendment to the NBRLUP is being caught up in other issues between NPC and the federal government, including larger funding questions. Those questions should be put to the side.

... /2

QIA and NTI do not share the view as stated by NPC in a letter dated July 4, 2017 that *"NUPPAA requires the NPC to consider the proposed amended through a public review process, which includes soliciting feedback and holding a public hearing in the impacted communities."* [Emphasis Added]. We note the relevant section of NPC's Internal Procedure:

"5.2. A Public Review provides an opportunity for public input; it does not necessarily imply a public meeting or hearing. The need for a public meeting will depend on the significance of the amendment and the degree of public concern/interest the Commission anticipates the proposal may generate. If the Commission believes the level of public concern/interest is not significant, the public review may be conducted by providing the opportunity for written submissions or presentation at a regular Commission meeting."

Indeed, our understanding of the relevant NUPPAA text and NPC Internal Procedure is that the decision to conduct a public review or not lies with the Commissioners. Based on written correspondence from NPC dated May 17, 2017, it would appear premature to conclude that (1) a public review (including a public hearing) is necessary in this case, or (2) NPC cannot move ahead because of funding issues relating to a public review.

In representing the rights and interests of Inuit, QIA and NTI have always been strong advocates for public participation. Without compromising that commitment, we believe that there are alternative means of conducting public reviews available to the NPC. The particulars of this case do not require multiple/extensive community engagement sessions or the expenditure of excessive resources. A more modest and less time-consuming form of public input appears warranted in relation to this proposed plan amendment.

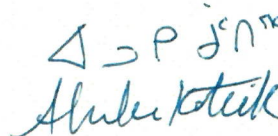
That said, should NPC elect to process the amendment request consistent with subsection 4.7 (b) of the NPC Internal Procedure, parties might not provide an adequate opportunity to present views on the proposed amendment submitted by BIMC on March 17, 2017. QIA and NTI, therefore, suggest that review of the amendment under subsection 4.7 (c) of the NPC Internal Procedure would be appropriate given the circumstances of this proposed amendment.

QIA and NTI are mindful that prompt decision-making is appropriate on this matter, in relation to both procedural and substantive aspects, and we invite you to move as quickly as practical to that end.

Sincerely,



Olayuk Akesuk
QIA Vice President (Acting President)



Aluki Kotierk
President, NTI

CC Mr. Todd Burlingame, Baffinland
Honorable Minister Savikataaq, Government of Nunavut



በጥናቱ ጋር፣



$\Delta \rho_j^n$
Hilbertsche

ბიზანტიზმის დრო (XIV-XV სს. ოსმალეთის იმპერიის დაპყრობის შემდეგ)

$\gamma^{\alpha\beta}\delta^{\mu\nu} \Delta^{\rho\sigma\tau\kappa\lambda\eta}$

[illegible]