

"የየ"ርԺ Δ⊅Δ° Ьጋ⊁⊱℅∩Ր℉ Qikiqtani Inuit Association

September 8th, 2017

A C C Serving the communities of

△<∧⊲^ч√^в Arctic Bay

P^α·····LΔ^c Cape Dorset

b∿Ր%フじ∧⁶ Clyde River

Δ⊳∠Δ^c Srise Fiord

くっくとり Hall Beach

> ∆لےر⊸ Igloolik

کدہ∆^c Iqaluit

PLT >c

<°σ%)% Pangnirtung

Fond Inlet

^sPP%C^s≺√3% Qikiqtarjuaq

% トレンム^cン% Resolute Bay

トーΡ → △% Sanikiluaq Mr. Todd Burlingame Vice President Sustainable Development, Health, Safety and Environment Baffinland Iron Mines Corporation (BIMC) 2275 Upper Middle Road East, Suite 300 Oakville, ON L6H 0C3

Mr. Burlingame,

RE: Request to Amend the North Baffin Regional Land Use Plan (NBRLUP), Clarification Requests

The Nunavut Planning Commission (NPC) recently issued a request for comments on the Proposed Plan Amendment by Baffinland Iron Mines Corporation. NPC is requesting that parties submit comments to the NPC by October 2nd, 2017. In order to facilitate QIA's ability to develop and submit comments QIA has prepared a series of clarification requests which will improve our understanding of your land use plan amendment application. Recognizing the short timelines parties have to develop and submit comments, QIA is requesting a prompt response to our clarification requests.

In developing these clarification requests QIA is relying upon the following documents:

- Project Proposal, Mary River Phase II Expansion Project (Revised October 2014 Submission).
 Baffinland Iron Mines Corporation. February 3rd, 2017 ("the Proposal").
- Proposal for Amendment to the NBRLUP in relation to the Mary River Phase II Expansion Project (NPC File 148420). Baffinland Iron Mines Corporation. March 17th, 2017 ("the proposed Amendment").
- Jason Prno Consulting Services Ltd. 2017. Results of Community Workshops Conducted for Baffinland Iron Mines Corporation's Phase 2 Proposal. Report prepared for Baffinland Iron Mines Corporation. January 2017 (the "IQ Report").

Clarification Requests

- The Proposal describes the need for winter sealift using ice breaking as being limited to delivery
 of freight. Can BIMC please clarify which of the following activities are contemplated for an
 under the proposed Amendment.
 - a. Winter transportation of project equipment, materials and consumables.
 - b. Winter transportation of fuel
 - c. Winter transportation of ore
 - d. Winter transportation of hazardous goods

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



ハト(ハパー) Communities of

△<∧⊲^ч√ Arctic Bay

P^α·····LΔ^c Cape Dorset

b∿Ր%フじ∧ら Clyde River

Δ⊳∠Δ° Grise Fiord

くっくとり Hall Beach

> ∆لےرہ Igloolik

 Δ^{G} اqaluit

PLT >c

く[°] σ[%])[%] Pangnirtung

Fond Inlet

⁵PP[®]C⁵≺√3[®] Qikiqtarjuaq

% Resolute Bay

۲۰۹۵ کد ۲۰۵۳ Sanikiluag

"የΡ∿ርԺ Δ⊅Δ° ЬϽ⁵⊁℅⋂Րʹ∿Ր° Qikiqtani Inuit Association

- 2. The *Proposal* describes the need for winter shipping as being "if required to support on-going operations". This seems to suggest that winter shipping would not be the norm. Can BIMC please describe the intention of "if required"? Under what circumstances might BIMC decide support for on-going operations would require a winter sealift?
- 3. Does BIMC foresee winter sealifts as occurring on an annual basis, i.e. would the general operation of the project rely upon winter sealifts, or, are winter sealifts contemplated on an "asand-when needed" basis. The *proposed Amendment* seems to suggest infrequent and irregular use of the proposed corridor for winter sealifts. Can BIMC better estimate the likely frequency and use of the proposed corridor?
- 4. The *Proposal*, under section 5.5.1.2, references a 10km as the "transportation corridor concept indicated by the Nunavut Planning Commission (NPC) in its Draft Nunavut Land Use Plan (NPC, 2016)". Can BIMC confirm if the NPC has indicated whether this "concept" applies to the existing transportation corridor listed under Appendix Q of the NBRLUP? QIA is unclear whether this 10km reference is simply a potential concept raised for discussion by NPC, and which may be unrelated to the existing corridor listed in NBRLUP, Appendix Q.
- 5. The development of a railway is presented as a key component of the both the *Proposal* and *proposed Amendment*. Can BIMC confirm whether the railway will be developed upon the existing tote road surface, or, if the railway will be a structure separate from the existing Tote Road.
- 6. The *Proposal*, under section 4.1, presents a summary of Phase II Engagement Activities. The Proposal also presents a series of summaries from these engagements, example Table 4.1. Can BIMC confirm whether the Proposal should be replied upon as the primary document describing key community concerns identified in relation to the Phase II project? Are there other source documents that identify the results of engagement activities? For instance QIA has also reviewed received a copy of BIMC's *IQ Report* which described efforts to collect and apply Inuit Qaujimajatuqangit.
- 7. Having participated in workshops described under section 4.2 of the *Proposal*, and, documented in the BIMC *IQ* Report QIA is aware of five key community concerns that have been raised in relation to the transportation elements of the *Proposal*; avoidance of ice-breaking during ice establishment, a preference toward using Navy Board Inlet as a winter shipping route (as opposed to Eclipse Sound), avoidance of shipping during times of sensitivity for seals, avoidance of icebreaking during times of high sea ice use by community members, mitigation measures to allow for safety of travel prior to and following icebreaking events. Can BIMC please clarify where the Proposal and the *proposed Amendment* address each of these key community concerns.
- 8. Appendix J of the NBRLUP requests that an applicant provide the NPC with a prescribed list of information to support consideration of a transportation corridor. Does BIMC believe that all information as required under Appendix J are contained within the *Proposal* and the *proposed Amendment*? Should other documents be considered, and if so for what purpose? For example,



ハト(ハパー) Communities of

△<∧⊲^ч≺^в Arctic Bay

P^α·····LΔ^c Cape Dorset

b∿Ր%フじ∧ら Clyde River

ΔΣ⁶ Grise Fiord

くっくとり Hall Beach

> ∆لےر⊸ Igloolik

کدطک^c Iqaluit

ριγος Kimmirut

く[°] σ[%])[%] Pangnirtung

Pond Inlet

የP%Cናረረሜ Qikiqtarjuaq

% トレンム^Cン% Resolute Bay

۲۰۹۵ کد ۲۰۵۳ Sanikiluag

"የየ"ርԺ Δ⊅Δ° Ьጋ⊁⊱ኄ∩Ր℉ Qikiqtani Inuit Association

QIA is aware that shipping route alternatives were presented by community members and have been discussed since 2014 yet this topic is only briefly mentioned in the *Proposal*. Information relating to environmental, social, cost considerations does not seem to appear at all in the Proposal and Application.

- 9. The *Proposal* suggests "the ore shipping season is proposed to be from July 01 to November 15, but would be adapted annually in consultation with the Pond Inlet Hunters and Trapper Organization (HTO) based on ice conditions and thickness. The *proposed Amendment* suggests winter sealifts will only occur between December and February. The Can BIMC clarify the following:
 - a. Should the *proposed Amendment* and *Proposal* be understood to mean that icebreaking will only take place after taking the views of the HTO into consideration?
 - b. Should the *proposed Amendment* and *Proposal* be understood to mean that icebreaking will not occur during times of ice establishment?
 - c. Should the *proposed Amendment* and *Proposal* be understood to mean that icebreaking will not occur prior to break-up?
 - d. Is icebreaking only contemplated during the time period between December and February?
 - e. Is icebreaking only contemplated in relation to shipments of freight?
- 10. The proposed language in Part 2 of the proposed Amendment if read on its own, suggests a broad interpretation could be taken as to what "the marine corridor may be used for shipments of freight by winter sealift through ice during the months of December, January and February." Can BIMC confirm that a broad interpretation is not intended and is to be read in conjunction with defined limitations (to be clarified) to the requested use that is proposed in the proposed Amendment and Proposal and described in the Proposal?
- 11. The *Proposal* includes a general description of the activities contemplated for the Phase II, with the *proposed Amendment* presumed to be designed to align with the activities proposed. Can BIMC confirm that the *proposed Amendment* is definitely NOT designed to permit uses to accommodate the following activities, which are notably not included in the *Proposal*:
 - a) Increasing frequency of icebreaking in December-February.
 - b) Increasing the length of general shipping season (i.e. that winter shipping would be irregular and infrequent rather than used to lengthen the shipping season).
 - c) Expanding the use of icebreakers.
 - d) Expanding the proposed "freight" only for winter sealifts, to also include
 - a. Shipping hazardous materials
 - b. Shipping out iron ore
 - c. Shipping fuel
 - e) Ice management at locations other than Milne Port
 - f) Trans-shipping outside the marine corridor
 - g) Multiple anchorage locations outside the marine corridor



'የየ∜ርԺ Δ⊅Δ° Ьጋ⊁⊱℅∩Ր℉ Qikiqtani Inuit Association

A translated copy of this letter is forthcoming and will be distributed as soon as it is available.

ハト・ハト・コート ・ロー・プロート Dodo かし Serving the communities of

> △ベヘヘッペト Arctic Bay

P^αUΔ^c Cape Dorset

Ь℃%ጋኒ∧ь Clyde River

ጎσናታ^ቴ Hall Beach

 Δ^{ι} Igloolik

ک⊿د Iqaluit

PLT >c
Kimmirut

く°σ%)% Pangnirtung

Fond Inlet

SPP%C5イd% Qikiqtarjuaq

% トレンム^cン% Resolute Bay

トーΡ → ▷ □ [%] Sanikiluaq Sincerely,

SWB

Stephen Williamson Bathory Director Major Projects Qikiqtani Inuit Association

CC - Mr. Tommy Owlijoot (NPC)

Mr. Goump Djalouge (NPC)

Mr. Jaykolassie Killiktee (Chairperson, MHTO)

Mr. Joshua Katsak (Mayor, Pond Inlet)