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that “[the] following planning guidelines will be used in the assessment of a **new** transportation/communications corridor proposal” (emphasis added).

Based on the application materials provided, the GN's position is that BIMC has requested an amendment to the already existing corridor established in Appendix Q through NBRLUP Amendment #1. Given the above, the GN submits that Appendices J and K do not apply in the given set of facts. BIMC has not requested the development of a new transportation corridor. BIMC provided the information requested by the NPC on March 9, 2017.

Finally, the GN states that the s. 3.5.10 information requirements have been satisfied to amend the already existing corridor established in Appendix Q.

In the alternative that the NPC should find that Appendices J and K do in fact apply, the GN submits that information requirements have been satisfied. A fulsome review of the entire online record for the amendment application will show that all information required in Appendices J and K has been provided. The GN is satisfied with the information provided and has no concerns as to the adequacy of BIMC's submissions with respect to requirements in Appendices J and K.

Consistency with Governing Documents

The GN submits that the proposed amendment is consistent with the Nunavut Land Claims Agreement, the *Nunavut Planning and Project Assessment Act*, and the NPC's broad planning policies, objectives and goals.

Appendix I: Caribou Protection Measure

The GN submits that Appendix I does not require revisions in connection with BIMC's amendment application to the NBRLUP, or prior to NPC's issuance of a conformity decision regarding the proposed railway.

In addition, the GN submits that the NPC's recommendation with respect to the amendment application is a separate matter from both land manager leasing requirements, and the additional requirements that will occur during screening and environmental assessment stages of Mary River Phase II's approval process.

Finally, it is the GN's position that environmental assessment is the appropriate venue for determination of additional caribou protection measures. The GN is a consistent intervenor in Nunavut Impact Review Board environmental assessments, and has an interest (through the *Wildlife Act* and *Environmental Protection Act*) in ensuring the Mary River Phase II's Terrestrial Environment Mitigation and Monitoring Plan (TEMMP) appropriately protects caribou, other terrestrial wildlife, and the environment.

Multi-Modal Uses

It is the GN's position that, generally, creating transportation corridors for any type or mode of transportation uses would be appropriate.

Compatibility with Easements Created by Nunavut Agreement

The GN submits that consideration of the Nunavut Land Claims Agreement Schedule 21-2 easement is not relevant to the application. In the alternative that it is relevant, the GN submits that the easement and the proposed amendment are compatible.

The GN would like to reiterate our ongoing support for Nunavut's Institutions of Public Government and the vital role they play in our environmental regulatory system, and we look forward to our continued participation in the assessment of BIMC's amendment application. Should you have any questions or concerns please contact Amy Robinson, A/Manager, Land Use and Environmental Assessment, at (867) 975-7765 or by email at arobinson@gov.nu.ca.

Qujannamiik,



Steve Pinksen
Assistant Deputy Minister