



November 26, 2018

Jonathan Savoy,
Manager of Planning & Implementation
Nunavut Planning Commission
Box 1797
Iqaluit, Nunavut
X0A 0H0
Submissions@nunavut.ca

Re: Nunavut Land Use Plan, 2016

Dear Mr. Savoy,

Further to your additional request for written submissions regarding the 2016 Draft Nunavut Land Use Plan (2016 DNLUP), please see the following additional comments.

1. Background and Objectives

Baffinland Iron Mines Corporation (Baffinland) has participated in the Nunavut Planning Commission (NPC) process respecting the development of the Nunavut Land Use Plan (NLUP) and has commented previously on the 2016 DNLUP (see in particular our submissions of March 4, 2016 and January 13, 2017 and participation in related workshops organized by NPC). Baffinland intends to continue to participate in the NLUP process.

2. Specific Comments and Recommendations

Two Mary River transportation corridors are currently shown on the two schedules included in the 2016 DNLUP. Schedule A currently shows the corridor between the Mine site and Milne Port as an Existing Transportation Corridor and Schedule B shows the south rail route between the Mine Site and Steensby Port as a Proposed Transportation Corridor.

Baffinland recommends that all transportation corridors previously recommended by NPC and the Nunavut Impact Review Board (NIRB) relating to the Mary River Project be included on the Land Use Designations figure (Schedule A) and on the Valued Components of Nunavut figure (Schedule B).

3. Rationale

The current NIRB review of the Phase 2 Project Proposal is evaluating the potential for environmental and socioeconomic effects arising from the use of rail within the Northern transportation corridor. As part of that review, the NIRB is also considering potential for cumulative effects arising from the use of rail within the Northern transportation corridor in light of the already permitted rail and shipping

activities within the Southern transportation corridor. Baffinland will not be permitted to proceed with the Phase 2 Project Proposal activities until the NIRB process is complete.

Baffinland continues to be of the view that all transportation corridors that are applicable to the Mary River Project, including the Northern shipping transportation corridor, the Northern land transportation corridor (road and rail), the Southern land transportation corridor (rail) and the Southern shipping route should all be reflected in the Nunavut Land Use Plan (NLUP).

The Northern transportation corridor is currently included in the North Baffin Regional Land Use Plan (NBRLUP). Baffinland notes that since our submission on the 2016 DNLUP of January 13, 2017 the NBRLUP has been amended to specifically authorize the use of rail within the Northern transportation corridor. Therefore, Baffinland respectfully requests that this amendment be reflected in the NLUP.

With respect to the Southern transportation corridor, per the NPC's correspondence of Dec. 9, 2013 to the Government of Canada and the Government of Nunavut, the NPC recommended an amendment to the NBRLUP to include the 35 km portion of the 180 km long land portion of the Southern transportation corridor located inside the North Baffin planning region. More generally, the Southern transportation corridor located outside of the NBRLUP has already been approved by the NIRB as per Project Certificate No. 5 and as such is an "Existing Use". Since that NPC recommendation and the issuance of Project Certificate No. 5, Baffinland has been clear in all of its applications and in participation in related public processes that it intends to proceed with the Steensby Railway and that the Early Revenue Phase (ERP) and Phase 2 are not alternatives to the approved Mary River Project. Therefore, Baffinland respectfully requests that as the Southern transportation corridor has already been recommended for approval by NPC and the NIRB, the Southern transportation corridor should be included in the NLUP as an Existing Transportation Corridor.

Thank you for taking these submissions into consideration as the NPC considers its next steps with respect to the 2016 DNLUP.

Sincerely,



Megan Lord-Hoyle

Director, Sustainable Development
Baffinland Iron Mines

Cc:

Grant Goddard, Baffinland Iron Mines
Lou Kamermans, Baffinland Iron Mines