



June 1, 2015

Jonathan Savoy, Senior Planner
Nunavut Planning Commission
P.O. Box 2101
Cambridge Bay, Nunavut X0B 0C0

Sent via electronic mail

Dear Mr. Savoy,

Re: Application for Standing as Participant at the Technical Meeting, Pre-Hearing Conference and Public Hearing for the draft Nunavut Land Use Plan

This letter is Baffinland Iron Mines Corporation (Baffinland)'s application for standing as a participant in the upcoming proceedings on the draft Nunavut Land Use Plan, in accordance with the Nunavut Planning Commission's (**NPC's**) notice of Public Hearing on the Draft Nunavut Land Use Plan, dated May 1, 2015. It is Baffinland's understanding that participant status will ensure we receive further notices of the Public Hearing, be consulted on technical and procedural matters, and provide evidence and submissions on the 2014 DNLUP at the Public Hearing for the NPC to consider when revising the 2014 DNLUP for final approval.

Name:

Baffinland Iron Mines Corporation

Address:

2275 Upper Middle Road East, Suite 300
Oakville, ON, Canada L6H 0C3

Telephone Number:

(416) 364-8820 x5012

Email:

oliver.curran@baffinland.com

Address for service of documents (via fax/email):

ckowbel@lawsonlundell.com; and

oliver.curran@baffinland.com

2275 Upper Middle Road East, Suite 300 | Oakville, ON, Canada L6H 0C3
Main: 416.364.8820 | Fax: 416.364.0193 | www.baffinland.com

Represented by:

Christine Kowbel, Lawson Lundell LLP
1600 – 925 West Georgia Street,
Vancouver, BC V6C 3L2
(604) 631-6762
ckowbel@lawsonlundell.com

Language:

English

Reasons for Baffinland's interest in the proceeding:

1. Baffinland has a substantial and direct interest in the NLUP

Baffinland operates the Mary River iron mine in the North Baffin Region of Nunavut, and has additional mineral rights in the region, including mineral tenures that pre-date the Nunavut Land Claims Agreement. The operations at Mary River involve mining and mineral exploration as well as terrestrial and marine transportation. In developing the Mary River mine, Baffinland has made a significant financial investment in Nunavut. The company has taken a phased approach to mine development and permitting, with the result that it is expected that some future activities will require additional permitting beyond what is already underway in regulatory processes.

If the draft Nunavut Land Use Plan is approved, we understand that it will apply to the entire Mary River Project area (including transportation routes) and will replace the North Baffin Regional Land Use Plan which now covers a portion of the project area (including transportation routes).

As such, Baffinland expects that some of its future activities will require conformity review(s) under the Nunavut Land Use Plan once that plan is adopted and approved. Baffinland therefore has a direct and substantial interest in the Nunavut Land Use Plan. Given that the Nunavut Land Use Plan has potential to impact the ongoing operations and future development of the Mary River Project, Baffinland has a substantial and direct interest in the final draft of the Nunavut Land Use Plan that is referred to the Ministers for approval.

2. Baffinland's participation will further the public hearing

In the course of Baffinland's work on the Mary River Project, Baffinland has conducted many environmental studies and gained valuable experience and insight into conducting mineral exploration and mining in the Arctic environment in an environmentally and socio-economically sustainable way. We anticipate, for example, that Baffinland could provide evidence related to the following types of issues, among others:

- Shipping and other forms of transportation;
- Information from existing scientific studies on wildlife and other environmental components in the North Baffin region and other areas of Baffin Island and surrounding waters;
- Procedural aspects of Nunavut Land Use Plan administration from an industry perspective.

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Main: 416.364.8820 | Fax: 416.364.0193 | www.baffinland.com

Baffinland notes that in the NPC's "Broad Planning Policies, Objectives and Goals", dated November 10, 2007, the NPC articulated five goals. Goal 5 is "Encouraging Sustainable Economic Development, Provide for a Range of Economic Opportunities such as Renewable Resources, Tourism, Energy, Mineral and Petroleum sectors." The NPC set out a number of Objectives and also Broad Land Use Planning Policies in connection with that Goal, including those in the following table. The table below describes how providing standing to Baffinland will align with and further these objectives and policies:

Broad Land Use Planning Objectives	Broad Land Use Planning Policies	Comments
It is an objective of the Nunavut Planning Commission that Land Use Planning:	It is a policy of the Nunavut Planning Commission that Land Use Planning:	
A encourages diversified economic development that increases employment, business opportunities, training and other benefits which includes, but is not limited to: <ul style="list-style-type: none"> • commercial harvesting of marine and terrestrial animals in a sustainable manner that is consistent with the goals of the Nunavut Wildlife Management Board, Hunters and Trappers Organizations and Government; • sustainable tourism and outfitting development; • long term strategies for mineral and petroleum resource development and use; • the arts sector, by ensuring access to, where appropriate, known sources of carving stone, flora and other natural materials used by artisans; • sustainable fisheries; • energy generation, supply and conservation, including alternative energy systems and renewable energy systems; and • value added, spin off and cottage industries. 	A.1 wherever possible, encourages efforts to assist sectors such as: harvesters, guides, outfitters, fishermen, prospectors, carvers, other artisans and tourism operators. A.2 to the extent possible provides for a mix of the economic sectors to secure balanced economic development. The relative weighting of economic sectors with respect to any particular community or region shall depend on the actual and potential economic opportunities at hand, the particular community or regional preferences, and the priorities and values of residents in the planning region.	Baffinland operates one of only 2 operating mines in Nunavut, and is a major employer of Nunavammuit generally and Inuit in particular. Baffinland's operations also provide many business opportunities and training opportunities. As such, Baffinland is in a position to provide information that will further Objective A and Policy A.2.
B.2 promotes research to improve and advance sustainable resource development in Nunavut.	B.2 will encourage land use activities to advance the use of cold weather and other sustainable and environmentally appropriate technologies.	Baffinland has done research and other work to advance the use of cold weather and other sustainable and environmentally appropriate technologies, and may be able to provide information should the need arise.

<p>C.1 takes into account geographic areas of value for non-renewable resources or other commercial values and identifies development opportunities associated with those areas.</p> <p>C.2 recognizes the economic goals, opportunities and needs of communities specifically, and the Nunavut Settlement Area generally.</p>	<p>C.1 assesses the economic potential of land uses for consideration in planning decisions.</p> <p>C.2 requires consultation with Nunavut communities and other planning partners to identify appropriate development to achieve their economic goals.</p>	<p>Having engaged in mineral exploration and mining in Nunavut, Baffinland is in a good position to engage in conversation with communities and other stakeholders about opportunities for appropriate development of mineral resources to achieve their economic goals. A solid knowledge of mining operations as practiced in the North is essential for actually achieving economic goals that the communities may have for mineral development, and therefore Baffinland believes it has a role to play in that conversation.</p>
<p>D recognizes that the development of resources requires efficient and safe transportation infrastructure and corridors.</p>	<p>D takes into account Nunavummiut interests related to land, air and marine transportation corridors.</p>	<p>Baffinland has experience working on issues related to transportation corridors for resource development, and has first-hand knowledge of the vital importance of efficient and safe transportation infrastructure and corridors to make resource development feasible and unlock the economic potential of Nunavut's resources.</p>
<p>E maximizes economic and social benefits to Nunavut communities and Inuit from development.</p>	<p>E takes into account initiatives being undertaken through the Nunavut Economic Development Strategy and support, where possible, its goals and objectives.</p>	<p>Baffinland can provide information regarding benefits from mining and mineral exploration to North Baffin communities and Inuit.</p>
<p>F ensures that the goals of any proposed restrictions on land use are achieved with the least possible impact on undiscovered mineral resources, while taking into account environmental and social objectives.</p>	<p>F.1 will, before any restriction on land use is created, review and assess the available data and research, broad planning goals and objectives, legislation, policies, priorities and values of residents and other planning partners, and programs relating to conservation, land use planning, wildlife management and parks to determine whether the restriction is warranted.</p> <p>F.2 provides clear direction and guidance regarding the conservation, development, management and use of land to</p>	<p>Regarding policy F.1, Baffinland may have information available from scientific studies which is relevant to determining whether certain land use restrictions are warranted.</p> <p>Regarding policy F.2, Baffinland can provide information regarding what would policies be useful for encouraging investment and for providing certainty to land users wishing to explore and develop minerals.</p>

	provide certainty to land users, encourage investment, minimize risk and costs, and streamline the regulatory process to ensure Nunavut resources can compete in a global market place.	
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3. Baffinland's participation will contribute to the openness and fairness of the public review

Baffinland has not yet had an opportunity to provide feedback on the June 2014 draft Nunavut Land Use Plan. As a stakeholder with existing mining operations and mineral rights, some of which pre-date the Nunavut Land Claims Agreement, Baffinland is keenly interested in the proposed land use designations overlapping and in proximity to its mineral holdings, its mining project, and designations relating to potential or existing transportation routes. Although the draft land use designations do not at this time appear to conflict with Baffinland's current and planned activities, we understand that these designations are still a matter under public review. In the interest of fairness Baffinland should be granted participant standing so that it will be in a position to seek clarification of and respond to any submissions that may be made by others in respect of proposed land use designations in areas which may impact on the operation and future development of the Mary River project.

Particularly given the information that Baffinland has obtained in the course of its project impact assessments and permitting proceedings, we expect to be in a position to provide useful, informative comments on land use designations in the areas we have studied, should the need arise.

Nature and Scope of Baffinland's Intended Participation:

Generally, Baffinland will have a keen and direct interest in any matters relating to shipping as well as generally any designations which may impact industrial development in the North Baffin region. As explained above, there are a number of matters on which Baffinland may wish to provide evidence during the technical meeting and public hearing, including shipping and transportation along the Northern and Southern shipping routes to the project, and information relevant to the land use designations in the areas where Baffinland has conducted environmental studies.

Baffinland would like to participate at the participants' technical experts meeting (Technical Meeting) on June 23 to June 26 2015, at the Cadet Hall in Iqaluit, as well as at the Pre-Hearing Conference to be held July 14 to 16, 2015. The scope of participation would include oral submissions on the Draft Nunavut Land Use Plan generally and specific land use designations, and written submissions as necessary. We also anticipate that we will wish to participate in the Public Hearing.

We intend to include additional Baffinland representatives, as deemed necessary, and may bring along technical experts for support, including marine and terrestrial experts, whose qualifications would be provided with our technical submission.

Should you have any questions regarding this request, please contact myself at (416) 364-8820 ext. 5012 or oliver.curran@baffinland.com.

Regards,

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

Oliver Curran, Director
Sustainable Development

c.c. Erik Madsen (Baffinland)
Elizabeth Kingston (Chamber of Mines)