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Goump Djalogue

Manager Planning and Implementation

Nunavut Planning Commission

submissions@nunavut.ca

January 16, 2023

Dear Goump Djalogue,

Thank you for the opportunity to submit comments to the Nunavut Planning Commission (NPC) on Baffinland Iron Mines Limited's (Baffinland) proposed Amendment No. 1 to the North Baffin Regional Land Use Plan. For the reasons outlined below, **WWF-Canada believes that Baffinland's amendment application should not yet be approved, and the North Baffin Regional Land Use Plan (NBRLUP) should not yet be amended to include a new transportation corridor until proven mitigation measures are put in place to ensure wildlife protection.**

WWF-Canada is a conservation organization with permanent offices and staff in Iqaluit, working directly with Nunavut communities on shared conservation priorities. WWF has participated in the NIRB assessment of the Mary River project since 2008, and through our comments and participation, continue to press for the sustainable development of the project.

The purpose of Baffinland's amendment application is to include a new transportation corridor in the NBRLUP. WWF-Canada recognizes the importance of wildlife to Inuit, including the sustainable harvest of mammals. Maintaining viable populations of these mammals – including caribou, narwhal, polar bear and beluga – is a key priority for WWF, as it is for Inuit hunters and communities that depend on these species for food and income. WWF also recognizes that our conservation objectives in Nunavut must be met in a way that allows for community well-being to be enhanced through the sustainable and responsible development of resource projects. With that in mind, we submit the following for the Commission's consideration.

The proposed amendment has the potential to impact the terrestrial and marine environment, and the many wildlife species that live and migrate within the proposed transportation corridor. With regard to possible impacts, Baffinland asserts that impacts from the new rail corridor on community lifestyles will be "minimised" and that it will "not negatively impact important fish and wildlife harvesting areas or key habitat for fish and wildlife species, especially areas used by endangered species." The amendment does not address how interactions with terrestrial wildlife and land users will be reduced; dust and sedimentation will be minimized; noise and vibration effects will be reduced; and how cumulative impacts will be monitored.

The amendment also states that "Nothing in this Amendment will prevent or prohibit the use of the lands as described in this Amendment and as generally illustrated in Schedule "A" for the purpose of wildlife harvesting and/or traditional activities carried out by residents of the Region,

but it is not clear what measures will be taken to ensure wildlife harvesting and traditional activities will not be impacted by the new rail corridor.

Item 2 of the NBRLUP Appendix J requires that transportation corridors be designed in accordance with existing and prospective land use capability including topography, soil, permafrost and wildlife; and that they be designed in accordance with the availability of granular supplies. WWF maintains that Baffinland's proposed amendment does not adequately address the capability of topography, soil, permafrost and wildlife to support or withstand the development of a railway, nor does it speak to the availability of granular supplies to meet the needs of the proposed railway development.

The development of a railway corridor may involve significant changes to the topography (i.e., materials submitted by Baffinland in support of its southern railway indicated at some places, embankments of up to 300 metres in height may need to be developed to account for low lying areas and appropriate protection of permafrost). Additionally, Item 3 of the NBRLUP deals with impacts to wildlife, important harvesting areas and areas of scenic, historic, and cultural value. For these reasons, the development of a new railway corridor warrants further consideration.

WWF-Canada recognizes the importance of development to Nunavummiut and of developing projects like Mary River in a sustainable manner. However, further consideration through the NPC's process is required regarding the potential impacts of a new railway corridor and necessary mitigation measures required to address such a development.

WWF-Canada thanks the NPC for the opportunity to provide input at this critical stage in its consideration of the currently proposed amendment to the NBRLUP. We look forward to continuing our important work with Baffinland, the NPC and all parties engaged in the regulatory approvals processes for the Mary River Project.

Respectfully,

A handwritten signature in dark ink, appearing to read 'Mark Brooks', with a stylized, flowing script.

Mark Brooks
Senior Specialist, Sustainable Resource Development
WWF-Canada