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January 10, 2014

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Brian Aglukark, **Director Regional Planning Nunavut Planning Commission**

Cambridge Bay, NU

29 Mitik Street, P.O. Box 2101

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Dear Sir:

NPC Public Hearing, North Baffin Regional Land Use Plan, RE: Baffinland Iron Mines Corporation's Proposed Early Revenue Phase Project

The Qikiqtani Inuit Association (QIA) thanks the Nunavut Planning Commission (NPC) for accepting this submission that summarizes QIA's position regarding the transportation corridor proposed as part of the Baffinland Iron Mines Corporation's Early Revenue Phase (ERP). As requested by the NPC, the focus of OIA's review relate to Appendices J and K of the North Baffin Regional Land Use Plan (NBRLUP). Additionally, QIA provides further recommendations pertaining to Appendix I of the NBRLUP regarding Caribou Protection Measures.

As directed through the NPC-NIRB (Nunavut Impact Review Board) joint review process, QIA's January 13, 2014 Final Written Submission to NIRB contains detailed technical review comments and relevant applicability to the NBRLUP. QIA understands that the NPC will accept submissions to NIRB as the source for QIA's position with regards to Appendices J and K of the NBRLUP.

QIA's Final Written Submission to NIRB contains technical review comments pertaining to the topics of aquatics, terrestrial, engineering, and socio-economics. For each technical review comment, there is reference to its applicability to the NBRLUP. The following table denotes the QIA technical review comment their applicability to the NBRLUP. QIA respectfully directs NPC to QIA's Final Written Submission to NIRB for complete details.



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QIA Comment Reference	Subject Title	Applicability to the
Number in the Final		NBRLUP (Yes/No)
Written Submission to		
NIRB		
FM-1	Dust dispersal and deposition	Yes
FM-2	Shipping uncertainties	Yes
FM-3	Ballast water	Yes
FM-4	Oil spills	Yes
FM-5	Shipping impacts to marine	Yes
	mammals – narwhal impact	
	thresholds, monitoring and	
	mitigation	
FM-6	Shipping impacts to marine	Yes
	mammals – noise and disturbance	
FM-7	Shipping impacts to marine	Yes
	mammals – bowhead ship strike	
	risk	
FM-8	Monitoring and mitigation – ports	Yes
FM-9	Cumulative effects	Yes
B-1	Barrier effect of the Tote Road on	Yes
	caribou movement	
B-2	Effects of increased traffic along	Yes
	the tote Road on caribou calving	
B-3	Effects of increased traffic along	Yes
	the Tote Road on caribou mortality	
C-1	Impact assessment and production	No
	volume	
C-2	Tote road camp	No
SE-1	Employment and training	No

Additionally, QIA and the proponent are currently engaged in a process to develop Caribou Protection Measures in furtherance of the review of the proposed Transportation Corridor for BIMC's application for the Early Revenue Phase or "ERP". The Caribou Protection Measures being developed draw from Appendix I of the North Baffin Regional Land Use Plan (NBRLUP) and offer refinements to address project specific application. QIA submits that refined Caribou Protection Measures are necessary to address impacts on caribou due to increased use of the Milne Inlet Tote Road and would result in closer conformity with the requirements of the NBRLUP (conditional conformity granted August 13, 2013). In other words unless modified, QIA does not believe the project as proposed by



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QIA has recently presented its proposed Caribou Protection Measures to BIMC in the context of the Commercial Production Lease of Inuit Owned Lands (#Q13C301) in the project area. Pursuant to #Q13C301, QIA and BIMC are required to enter into an agreement on caribou protection measures within six months of the Commercial Lease date (Sept. 6, 2013). QIA has proposed that its measures be incorporated into BIMC's existing Territorial Ecosystem Mitigation and Monitoring Plan (TEMMP). However, as of the filing of this submission QIA and BIMC have yet to finalize an agreement on Caribou Protection Measures.

QIA will submit its proposed Caribou Protection Measures, including any agreement reached with the proponent during the NIRB Final Hearings. QIA therefore requests that the NPC consult the NIRB's public record on this topic prior to issuing a final conformity decision.

Regards,

Stephen Williamson Bathory,

Director Major Projects