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Société Makivik
Makivik Corporation

April 9th, 2009

Without Prejudice

Leslie Payette
Manager, Environmental Administration
Nunavut Impact Review Board
PO Box 1360
Cambridge Bay, NU
X0B 0C0

Re: Baffinland Iron Mines Corporation's Mary River Project

Dear Ms Payette:

Makivik Corporation has some concerns with regards to the proposed Baffinland Iron Mines Corporation's Mary River Project. The concerns are submitted in the context of the scoping exercise being carried out by the Nunavut Impact Review Board (NIRB).

Since the project may have significant impacts in the Nunavik Marine Region, review of the project would normally fall under the respective jurisdiction of the Nunavik Marine Region Impact Review Board (NMRIRB) and of the Nunavik Marine Region Planning Commission (NMRPC) created pursuant to the Nunavik Inuit Land Claims Agreement (NILCA). Whereas these bodies are yet to be formed, Makivik Corporation, in its capacity as the birthright organization representing Nunavik Inuit's interests, wants to highlight to the NIRB some aspects of the Mary River Project that may have specific impacts on the Inuit of Nunavik. Makivik Corporation also wishes to stress that this in no way substitutes or is in lieu of any input or position that the aforementioned boards may bring forward on this matter once they have been struck.

First, our principle concerns are in relation with the shipping route's that are to be used by the promoter both during the construction phase and the operation phase of the proposed mine. Although more information is required, the documents reviewed by Makivik, to date, show that Baffinland Iron Mines Corporation intends to use the Hudson Strait as one of the main shipping routes. Moreover, in so far as we understand, it plans to use that route year round.

From our perspective, this is an issue that will require consultation with the Nunavik Communities that are situated along the Hudson Strait. The project must be presented in detail to those communities, as well as to Makivik Corporation. Once properly informed, we will make the appropriate representations to the NIRB. Our representations will include, but not be limited to, potential environmental impacts that may result from use of the proposed Hudson Strait shipping route all year round.

As one example of a critical issue involved, Hudson Strait is a route used by beluga whales in their annual migration. Moreover, evidence from both Traditional Ecological Knowledge and science suggests large aggregations of whales from various genetically distinct stocks overwinter in Hudson Strait. As beluga whales constitute an important part of the diet of both Nunavik and Nunavut Inuit and considering the importance of the hunt as part of our traditional way of life, it is crucial that any impacts consequent from shipping activities on either migrating or overwintering whales must be limited. In

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addition, any impacts infringing on the right to harvest said whales or any other species traditionally harvested by Nunavik Inuit must be mitigated.

Hence, we are firstly concerned about any potential impact on commercial fishing or tourism activities that the Inuit of Nunavik are currently or may be engaged in resulting from the proposed shipping activities.

Secondly, we assume that you have directly involved the Makivik nominated alternate member representatives to the NIRB, messrs. Putulik Papigatuk and Henry Alayco in respect to seeking their input on this issue. If not, then we obviously encourage you to do so.

Thirdly, the NMIRB and the NMRPC, once in operation, must be implicated in the review of the project.

Lastly, the concerns expressed in the present letter are preliminary. Makivik requires further and more precise information to properly assess the potential impact of the Mary River Project for the Nunavik Inuit. In specific, we wish to receive more detailed shipping routes for all phases of project development and implementation. Therefore, Makivik Corporation submits the current comments under reserve of its right to bring other issues to the attention of the NIRB on this matter.

Makivik Corporation is available to assist the NIRB and the promoter of the project to plan for an information tour to take place in Nunavik and Stas Olpinski may be contacted to act as a liaison in this regard.

We trust that our concerns will be duly considered and are looking forward to hearing back from the NIRB in the near future. In the interim, should you have any questions, please feel free to communicate with Stas Olpinski located at our Montreal office or myself

Yours truly,

A handwritten signature in black ink, appearing to read 'P. Aatami'.

Pita Aatami
President

cc Johnny Peters VP Makivik Corporation
The Honorable Chuck Strahl, Minister INAC
Derek Chubb, Baffinland Iron Mines Inc.
Sharon Ehaloak, Nunavut Planning Commission
Dionne Filiatrault, Nunavut Water Board
Putulik Papigatuk
Henry Alayco
Stas Olpinski