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March 17th, 2011

Ryan Barry マッマタ・イ・

Director, Technical Services Nunavut Impact Review Board

P°°LΔ¢ Cape Dorset

Arctic Bay

29 Mitik, PO Box 1360 Cambridge Bay, NU

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Mr. Barry,

Re:

ΦΛΛΟ° Grise Fiord QIA Information Requests – Proposed Mary River (Nuluyait) Project

5055 Hall Beach The Qikiqtani Inuit Association (QIA) would like to thank the Nunavut Impact Review Board (NIRB) for providing the opportunity to present Information Requests on the Draft Environmental Impact Statement (DEIS) submitted by Baffinland Iron Mines Corporation (BIMC) for the Mary River Project.

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40P24° Sanikiluag The proposed Nuluyait Project represents the first time since the Nunavut Land Claims Agreement (NLCA) was signed that a major project will be reviewed within the Qikiqtani region. The areas stretching from Qinngua to Kangiqlluqjuag are homelands for Inuit. The wealth of the environment has sustained a society rich in culture for centuries and will continue to for centuries more to come.

The associated shipping routes through Foxe Basin, Hudson Strait, Milne Inlet and Baffin Bay add other significant dimensions. These ecologically complex and rich regions have sustained Inuit for centuries. It is our wish that they continue to do so for centuries to come.

QIA's approach to the environmental assessment and regulatory review is straight forward: only after each potentially impacted community is made fully aware of all project components (including their potential impacts, benefits and risks) can a decision about the Project be made.

The process of developing a major project in Nunavut is not without hardship. To reach a point where a Proponent has spent enough time contemplating the resource, the environment, and, the social framework to submit a DEIS requires patience, commitment and significance resources. The goals and objectives of a Proponent, as expressed in a DEIS, must also be understood as fitting within a spectrum of relationships.

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of Inuit within the Qikiqtani. This includes rights specific to representing Inuit through processes led by the Institutions of Public Government, rights to water and wildlife compensation, rights as a landowner, and, rights further defined through the negotiation of an Inuit Impact and Benefits Agreement.

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Beyond the Proponent, the IPGs and QIA, there are numerous other groups with direct relationships to the proposed project. Community working groups, Hunters and Trappers Organizations, Hamlet Councils, Territorial and Federal Government Departments all constitute important elements of the proposed project picture.

QIA, as a Designated Inuit Organization under the NLCA, represents the rights and values

For QIA the environmental assessment and regulatory process is more than reviewing a tall stack of documents. It is about developing an understanding of how a project is proposed to function, how responsibilities for the operational environment will be addressed, and, whether or not the final proposal presented is acceptable. Achieving such an understanding will require consistent commitment by all parties involved. The DEIS currently under review should be understood as a starting point.

It is clear that if the proposed Project goes forward, its extent and multi-generational nature will transform the socio-economic and environmental character of the North Baffin Region. It is also understood that impact predictions are fraught with uncertainties due to the multitude of confounding factors and the wide variation in the manner in which events actually take place. For these reasons, QIA places a high priority on proactive mitigation, management and monitoring.

In general, the DEIS presents ample data and a thorough discussion of the potential impacts and benefits that Inuit and communities may face. The attached Information Requests represent QIA's first attempt to review the DEIS in a comprehensive fashion. The comments are largely high level and have been drafted with the intent of further directing the nature and content of the review process. Certain comments challenge the interpretation of the information and the assumptions underlying assessment of impact. Others question the format of the review process and the roles of Responsible Agencies.

Though there are certainly elements of technicality that will require significant discussion, QIA believes the largest challenge will be the degree to which Inuit in potentially impacted communities are actively included in the review process in a meaningful way. For QIA this is a responsibility shared by all parties.



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QIA is actively taking measures to expand its communications, technical, coordination capacity to take on the challenge of the review process and look forward to working with you and all other interested parties.

マッマク・イ・ Arctic Bay Sincerely,

Parto Cape Dorset

Sincerely.

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A/Director, Lands and Resources

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Municipality of Cape Dorset

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Hamlet of Kimmirut

Gabriel Nirlungayuk, Director Wildlife and Environment-NTI

&C2079 Resolute Bay Sharon Ehaloak, Executive Director-NPC Dionne Filliatrault, Executive Director-NWB

Hon. Eva Aariak, Minister EIA-GN

40P248 Sanikiluaq Robin Aitken, RDG-INAC

Eric Kan, DFO Area Director-Eastern Arctic Area Office

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