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Hamlet of Pond Inlet
P.O. Box 180
Pond Inlet, Nunavut
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March 17th, 2011

Li Wan
Technical Advisor
Nunavut Impact Review Board
PO Box 1360
Cambridge Bay, Nu
X0B 0C0

RE: Response to Draft Environmental Impact Statement issued by Baffinland Iron Mines.

Dear Li,

The Hamlet of Pond Inlet received the Draft EIS from Baffinland Iron Mines on March 1st, 2011 for review and it is difficult to try and review a document of such size in a short amount of time. The Hamlet does not have the capacity to manage a document of this size and technicality without assistance. We understand that this review is still in its' draft stages, but in order to formulate a response that would be satisfactory to community residents would require financial assistance and a much more considerable amount of time. We understand timelessness are important to development of projects, but taking into consideration the size of the project and the potential impacts, it would only be fair to provide sufficient time for community residents to review in a comprehensive manner and time to provide input.

The Qikiqtani Inuit Association has worked on and representatives presented a condensed version of the "Human Environment – Volume 4" of the 10 volume, 5,000 page DEIS. It is with the assistance of the QIA that the Hamlet was able to provide some comments to the document. The Environment and Protection Committee had met to discuss the documents as presented and had the following comments. Where possible, comments are as well provided from community members who have had the opportunity to discuss what was presented to them.

1. Population and Demographics

- Committee members have echoed community concerns that they do not want to see another Nanisivik, where the entire infrastructure is built at the deposit site, without the outlying community benefiting from potential infrastructure that can support the project.
- There are community members that do have the concern that there may be a large amount of Southern workers that would like to move to Pond Inlet, and in the short term, may not have an effect on the community. In the long term, and for the duration of the whole project, there may be some adverse effects on the cultural integrity of the community.

2. Education and training

- It states that employee's will have to be 18 and over to work at the mine site, but community members thought that it would be beneficial to have students employed in areas that are compatible with their skills or positions offered at the site for summer employment that can lead to skills development and further employment if the students are still in high school. Although that it is very important that capable people are hired for specific positions, it could be beneficial to the youth in the community that could partake in entry level positions that would not be hazardous, including apprentice positions, or work experience positions would benefit younger people in the communities. With entry level, or seasonal jobs made available to students, it could create positive impacts with youth who desire jobs that are not available in the community.
- Training and education opportunities should be available for Northern residents in the North. There should be initiatives to train workers towards building up their capacity in the North. This could help increase the capacity of our communities to help "take care of our own" instead of sending Northerners to the South for training.
- Comments were made that the employment numbers with Inuit from the North Baffin and South Baffin (Iqaluit) does not reflect the actual numbers that were hired.

3. Livelihood and Employment.

-There was a statement in the document that has said that the mine will not have an adverse effect on harvesting practices in the communities in the North Baffin Region. Community and committee members had thought that this statement is untrue. Although that the culture is moving into a more monetary society, there is still a significant amount of Inuit that practice their traditional right to hunt and harvest animals that are for the large part, free of contaminants. With the development of the port at Milne Inlet, there is the opportunity for habitat change that can affect the traditional migration patterns of marine mammals in the area. Milne Inlet is a sensitive area for Narwhals and Char. There should be mitigation measures in place, or plans for such events. The Hunters and Trappers Organization has expressed interest in developing Koluktoo Bay for a commercial fishery and with the close proximity of Koluktoo Bay and Milne Inlet, there is a chance that if there is a catastrophic event should occur, ship sinking in the vicinity, or a large oil spill at Milne Inlet, it could permanently effect the ability to harvest country foods in the area. Community members have concerns that the long term effect of contaminants on the fish could have long term, adverse effects to the ability to benefit commercially on the area. This should be addressed during the technical review period of the NIRB process.

- Although there will be an increase in employment opportunities for Baffin residents, the presented document states that "without the infusion of jobs and income that the Project will bring to the region, harvesting activities will continue to decline". There was strong opposition to this statement. There is only a relationship presented that pertains to people who are employed, and how they will be able to continue harvesting activities with the assistance of an income. It does not present any information as to how sustenance hunters will be affected. Sustenance hunting will take place in the region, and although there is a slow decline in harvesting activities that has occurred over the last 40 years, community members conclude that it could happen at a faster rate, with more people being employed rather than out practicing harvesting. The affect on unemployed sustenance hunters must be presented and discussed, as there is a percentage of regional residents that do practice sustenance hunting to help provide for the household.

4 Human Health and Well Being

-Community members have concerns about the well being of Inuit residents that there may be an affect on family lives in Pond Inlet. With rotational shifts at the mine site, it could have adverse affects on home life for some residents. Although it is against Federal Government wishes of not having a town built on the mine site, it would be beneficial to have housing available for some families should it assist in retaining employment at the site, therefore mitigating some impacts of adverse affects of separating family members for extended periods of time.

-There are a percentage of community members that do rely on sustenance hunting through their traditional and cultural right to harvesting in the Milne Inlet area, including Koluktoo Bay. Should this project have significant impacts on the wildlife, ie: Narwhals, Arctic Char, this could have a significant negative effect on the health and well being of sustenance hunters right to harvesting. There needs to be discussions on the impact of development at Milne Inlet and the area in relation to cultural harvesting. Should there be mitigation efforts in place, they should be divulged to and discussed with community members rather than just stating that there are efforts in place. Community members wish to understand what these measures are before the development of the project.

-There appears to be a statement in the document that says, **“The periodic absence of mine employees from the community is not expected to affect life in the community generally.”** Community and committee members thought that this statement is untrue. There is the opportunity that employment at the mine site can have adverse affects on the community in regards to employment issues. Members felt that, although in some cases, it may be beneficial to have community members working out there, removing them from “unhealthy” environments in communities; it goes to say that it can as well create unhealthy environments for younger families who find it hard to be away from their households and their spouses. This could affect employment opportunities and as well create unhealthy environments as well too.

5. Economic Development and Self-reliance

-Although the document states that there will generally be economic benefits available to community members, companies in the region, and to employees of the company, it makes no mention of the self reliance of community members who do not choose to gain employment at the site. There could be negative impacts due to lack of wildlife in the area should there be adverse affects to migration patterns of caribou, fish, and narwhals. There should be discussions on the impacts of residents who hunt and harvest for sustenance. Mitigating efforts must be discussed and outlined before any further development.

-it states that “any negative effects to the land or to harvesting activities will be minimized”. Community members have expressed interest and request understanding in how these will be accomplished.

-Community members agree that there will be positive economic development opportunities for Pond Inlet and affected communities.

-The Hunters and Trappers Organization has expressed interest in making lakes in the Milne Inlet area available for commercial fishing. Fish stocks in the area need to be counted to ensure that they can be safely harvested without reducing stocks, but as well, this includes ensuring that they are not going to be affected by long term shipping and marine activities in

the area. Should ballast water be released in the inlets, it could prove devastating for area species.

6. Contracting and Business Opportunities

- The community residents and organizations agree that there will be significant positive impacts with contracting and business opportunities.
 - Community members state that there must be an MOU, or outlines for contracts with community companies, prior to development of the project. These negotiations should take place prior to any major development
 - Although there are several opportunities for contracts, they should not be ad-hoc contracts. The impacts on community infrastructure to support these contracts should be taken into consideration. IE: the community may not have the water or waste management infrastructure to host a laundry facility; therefore other opportunities should be made available.
 - Country foods should be made available to employee's who desire country food, and these should be purchased from the communities and HTO's in the region.
- It says that the company will implement programs to support local business development.
- When is the company going to draft them? Who is going to be involved in the planning process? Before implementing the programs?
- Any and all programs to develop the business in the community should be identified and outlined prior to the mine is put into place. MOU's, contracts and business opportunities should be identified prior to further development.

7. Community Infrastructure and Public Services

- The community infrastructure in Pond Inlet should be reviewed to see how we can increase the capacity of residents to maintain levels of services required in regards to community maintenance and services.
- There is a desire for Pond Inlet to have infrastructure available to help support the project. This includes a jet strip and possibly a docking facility should there be a requirement for one. Community members would like to discuss that with GN and Federal Government departments.

8. Cultural Resources

- Community members have had a generation's long attachment to the mine. It is named Nuluuyat by our ancestors. What will happen to the mountain when it is gone? Community members have a concern about the change to the environment and to the land surrounding the project and the deposit.
- Community members are concerned over all archeological sites that are known and possibly unknown in the deposit site and on projected land use areas. They recall during the bulk sample that, although there was an interest from the community to assist the company in developing and progressing, there was a great interest in preserving archeological artifacts and sites, and this was made known to key interest groups. Residents wanted a thorough inspection of land use areas for the bulk sample, and they were not granted one. Once the bulk sample was approved, the site inspections were speeded up to facilitate the development. Inspections were done via aircraft and members felt that if this is done again, it will have an impact on any known or unknown sites if any were discovered. They feel that the company does not share the same interest in archeological sites and reparation should be made in case

any site is disturbed. Should there be a site discovered that is currently an unknown, changes should be made to the project to protect areas of concern.

9. Resources and Land Use

-Narwhals may be disturbed in certain areas, at certain times of the year, including Lancaster Sound, Navy Board Inlet and Milne Inlet; this may affect cultural harvesting practices. The railway and lands used in the Mary River proximity as well will need to be studied and the impacts of the affected areas must be discussed during the formal review. Community members want to discuss how reparation is made to hunters and people who do not want to work at the mine, and what can be done to compensate for the loss of sustenance foods if negative impacts are encountered.

-Milne Inlet is important area for narwhal, to give birth and to feed, if affected by mining. Not all people in the communities will work at the mine; there are income support recipients that may need assistance with buying provisions, to sustain cultural activities. Community members have concerns about the distance hunters will have to travel to hunt, should there be adverse affects to migration patterns of species of interest. Some community members do not want shipping through Milne Inlet during the open water season due to the impact it will have on the sensitive marine environment and the amount of mammals it sustains.

- The document states that based on all the studies done on marine mammals, it is predicted that the Project will have a minor effect on marine mammal harvesting. Community members thought that this is untrue, as there has been an observed effect on Narwhals and seals during the bulk sample. Community members had noticed that there were less seals in the Milne Inlet area since the bulk sample and they were harder to find. The use of ships in Milne Inlet can cause significant changes to migration patterns for the Narwhal in the area. Milne Inlet, Lancaster Sound and Navy Board Inlet is a very sensitive area for marine mammals and mitigating measures must be identified, and agreed upon by Inuit in the region before any development. Community members would like to discuss reparation for disruption of habitat and the mammals in the area, as they feel there will be an impact.

10. Cultural Well-being

The document as presented, states that Inuktitut will be encouraged and promoted at the site, but residents may not agree with the statement. There should be meaningful discussions with the communities on how this will be accomplished, including the health of the ability to accomplish cultural harvesting practices for non employees who wish to travel the area.

11. Benefits, Royalty and Taxation

-Committee and community members agree with the comments made by the company in the respects to the Benefits, Royalties and Taxation areas as presented by the QIA, but community members feel that there have not been enough meaningful discussions to those respects with the community members. It has been brought up as a discussion item at many community consultation visits, but some feel that most consultations are not meaningful in the context of what compensation and reparation can be made to communities from negative external impacts in regards to development. Some community residents would like discussions on reparations sooner during the review rather than later in the review.

12. Cumulative Effects Assessment

Committee and community members feel that there may be cumulative effects within Pond Inlet with regards to migration of employee's from the community. Community members feel that there will need to be government assistance in increased training opportunities in place in the Pond Inlet to help maintain municipal services.

-Committee and community members felt that there could be the potential for increased substance abuse in the North Baffin region. They felt that there should be infrastructure in place to deal with them prior to development, and felt that this will need to be discussed with the Territorial Government.

It was regrettable that we were unable to provide concise input with what was presented in the short time frame. The Hamlet of Pond Inlet would appreciate more assistance with the documents in the future, and would appreciate to be able to have more time to review the Environmental Impact Statement in a more comprehensible manner to community residents. There is a great interest in the project amongst most community members and they would like ensure their input and concerns are heard and understood.

Sincerely,

(original signed)

Moses Koonark
Deputy Mayor
Hamlet of Pond Inlet

cc: David Qamaniq, CLO QIA representative
Rhoda Katsak, ED+T
Phillip Paneak, Community Director, IIBA Negotiator
Sam Omik, Chairperson, Hunters and Trappers Organization, Pond Inlet

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