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December 12, 2018

Ryan Barry
Executive Director
Nunavut Impact Review Board
PO Box 1360
Cambridge Bay, NU
X0B 0C0

Via email: rbarry@nirb.ca

RE: NIRB 08MN053: Information Requests for Baffinland's "Phase 2 Proposal" and Water Licence Application

Dear Mr. Barry,

On October 12, 2018, the Nunavut Impact Review Board (NIRB) distributed a letter to parties regarding the next steps in the NIRB's Reconsideration and Nunavut Water Board's (NWB) consideration of Baffinland Iron Mines Corporation's "Phase 2 Development" Project Proposal. This included the anticipated process map for the NIRB/NWB coordination of the project proposal.

On behalf of federal departments including, Crown Indigenous and Northern Affairs, Fisheries and Oceans, Environment and Climate Change, Natural Resources, Health, Parks and Transport Canada, I would like to express our concern about the process timeline provided for the Phase 2 Proposal, in particular the timelines anticipated between the technical meetings in March 2019 and the final written submission on April 5, 2019. Considering the information gaps federal departments outlined in their information requests, there is significant concern that the timeline does not allow sufficient time for departments to prepare the final written submissions following the technical meeting. In addition, the timeline does not account for proponent time to prepare their response to the technical meeting. The Government of Canada requests the NIRB modify the timeline between the technical meetings and the deadline for final written submissions, to enable the proponent to provide responses to issues raised at the technical meeting and allow the interveners time to analyse this additional information and prepare final written submissions.

We highly value the NIRB's role in assessing Nunavut projects and providing interested parties with an opportunity to effectively engage in the review process. It is essential to the



Phase II assessment that all stakeholders and interested parties are given the opportunity to meaningfully participate in the review process.

We appreciate the NIRB's consideration on these matters and look forward to participation in further stages of the Phase 2 Development project proposal reconsideration.

Sincerely,

Lisa Dyer
Director General
Northern Projects Management Office

cc:

David Rochette, Regional Director General, Crown-Indigenous Relations and Northern Affairs Canada

Mary Taylor, Director General, Environment Stewardship Branch, Environment Canada

Patrick O'Neill, Director General, Explosives, Safety and Security Branch, Natural Resources Canada

Shari Currie, Regional Director General, Prairie and Northern Region, Transport Canada

Chantal Roberge, Director, Environmental Health and Internationally Protected Persons, Health Canada

Dale Nicholson, Regional Director General, Fisheries and Oceans Canada, Central and Arctic Region

Jenna Boon, Field Unit Superintendent, Nunavut Field Unit, Parks Canada