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April 5, 2019

Ryan Barry
Executive Director
Nunavut Impact Review Board
PO Box 1360
Cambridge Bay, NU
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Via email: rbarry@nirb.ca

**RE: NIRB File No. 08MN053: Need for additional information for Baffinland's
"Phase 2 Proposal"**

Dear Mr. Barry,

As you are aware, technical meetings are being held next week as part of the Nunavut Impact Review Board's (the Board) reconsideration of Baffinland Iron Mines Corporation's (Baffinland or Proponent) *Phase 2 Development* project proposal, a proposed amendment to the approved Mary River Project. As the Government of Canada prepares for these meetings there is concern that information relevant to the *Phase 2 Development* review has not yet been submitted by Baffinland, namely the ice breaking assessment, simulation modelling report, and updated Cumulative Effects Assessment. Baffinland indicates in their technical submission dated March 26, 2019, that the planned submission date for these reports is anticipated between April and July 2019. In addition, submission of the updated management and monitoring plans are outstanding. Not having this information prior to the technical meetings, will limit the ability of the federal departments to discuss these topics in a meaningful and constructive manner at the technical meetings.

On behalf of the Government of Canada 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 concern regarding the process for technical review of these additional documents in the *Phase 2 Development* review. Currently, Baffinland is proposing that the Terrestrial or Marine Working Group Meetings be used to manage the additional information; however these groups function in an advisory capacity only to Baffinland. There is no mechanism to facilitate public participation nor is it clear how information from, or decisions made at, these meetings would be integrated into the reconsideration process before NIRB.



The Government of Canada supports the Government of Nunavut (technical review comment, number 22.2), World Wildlife Fund (technical review comment, page 4), and the Qikiqtani Inuit Association (technical review comment, number 46) that this outstanding information should be subject to a thorough technical review, including a technical comment period and technical meeting with the Proponent, the Board and intervenors.

We appreciate the Board's consideration on this matter and look forward to participating in further stages of the *Phase 2 Development Project Proposal* reconsideration.

Sincerely,

Lisa Dyer
Director General
Northern Major Projects Office

Cc.

Bernie MacIsaac, Deputy Minister Economic Development and Transportation,
Government of Nunavut

Megan Lord-Hoyle, Vice President Sustainability, Baffinland

PJ Akeeagok, President Qikiqtani Inuit Association

Andrew Dumbille, Senior Specialist, Sustainable Shipping, WWF-Canada

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

Mary Taylor, Environmental Protection Operations Directorate Environment and
Climate Change Canada

C. Thomas Hoggarth, Regional Director, Ecosystems Management Central and
Arctic Region, Fisheries and Oceans Canada

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

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

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

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

Mark Hopkins, Director General, Crown Indigenous Relations and Northern
Affairs