



NIRB File No.: 08MN053
CIRNAC File No.: N2008T0014
DFO File No.: 2008 MR
QIA File No.: LUA-2008-008

June 7, 2019

Kristin Westdal
Marine Biologist
Oceans North
100 Gloucester Street,
Ottawa, ON K2P 0A4

Sent via email: kwestdal@oceansnorth.ca

Re: Oceans North Concerns Regarding to the Technical Review Process for Baffinland Iron Mines Corp.'s Phase 2 Development Proposal

Dear Kristin Westdal:

On May 30, 2019 the Nunavut Impact Review Board (NIRB) received correspondence from Oceans North regarding information requests made to Baffinland Iron Mines Corporation (Baffinland or Proponent) and the technical review process for the NIRB's assessment of the "Phase 2 Development" Project proposal (NIRB File No. 08MN053). Specifically, Oceans North expressed concern with not having received satisfactory responses from Baffinland to its requests for models and additional information and regarding Baffinland's practice of holding meetings with parties outside the NIRB's formal assessment process to discuss technical matters related to the the Final Environmental Impact Statement Addendum (FEIS Addendum).

The NIRB acknowledges the concerns raised by Oceans North specifically and other parties more generally regarding the need for information requests to be satisfactorily addressed through the Board's public assessment process to enable a thorough understanding of the proposed project and its potential for impacts. The NIRB expects Baffinland to respond in detail to parties' outstanding technical review comments, including identification of those issues understood to be unresolved prior to the second Technical Meeting. The Board reminds Baffinland that the onus is on the Proponent to supply the information required to support the assessment process; the NIRB will continue to closely monitor the status of information requests and issue resolution for this assessment moving forward.

With respect to Oceans North's concern that there are several meetings on various technical issues being conducted following the submission of additional information but in advance of the NIRB's Technical Meeting, the NIRB encourages the Proponent, as the Proponent considers feasible and

appropriate, to meet with parties on an ongoing basis throughout the assessment to address concerns, answer questions and to generally work collaboratively to resolve issues. This type of engagement sometimes enables the parties to streamline and focus discussions at NIRB technical meetings and hearings, but these types of sidebar meeting are not a substitute for NIRB's formal assessment processes, are not directed by the NIRB and are driven by the Proponent and parties. Any resolution of issues that may arise through such external meetings is also required to be communicated through the formal assessment process in an open transparent manner for the information of all parties. As with any other party, Oceans North is encouraged to engage with Baffinland directly to identify upcoming opportunities for Oceans North to participate in these kinds of external discussions moving forward.

The NIRB appreciates the continued active engagement of Oceans North in the Board's assessment for the Phase 2 Development Proposal. Should you have questions or require any additional clarification regarding the upcoming Technical Meeting or other items, please contact Solomon Amuno, Technical Advisor II, at (867) 983-4603 or via email at samuno@nirb.ca.

Sincerely,

A handwritten signature in black ink that reads "Ryan Barry". The signature is written in a cursive style with a long horizontal line extending from the end of the name.

Ryan Barry
Executive Director
Nunavut Impact Review Board

cc: Grant Goddard, Baffinland Iron Mines Corporation
Megan Lord-Hoyle, Baffinland Iron Mines Corporation
Lou Kamermans, Baffinland Iron Mines Corporation
Jared Ottenhof, Qikiqtani Inuit Association
Joshua Arreak, Mittimatalik Hunters and Trappers Association
Mary River Distribution List