



**NIRB File No.: 08MN053**  
NWB File No.: 2AM-MRY1325

September 6, 2019

Andrew Dumbrille  
World Wildlife Fund  
318 Creekside Village  
P.O. Box 1750  
Iqaluit, NU  
X0A 0H0

*Sent via email: [adumbrille@wwfcanada.org](mailto:adumbrille@wwfcanada.org)*

**Re: Notice of NIRB Acceptance of World Wildlife Fund Request for Intervenor Status at the Upcoming Public Hearing for Baffinland Iron Mines Corp.'s "Phase 2 Development Proposal" Project Proposal**

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Dear Andrew Dumbrille:

The Nunavut Impact Review Board (NIRB or Board) has now reviewed the Application Form for Intervenor Status submitted to the Board on September 3, 2019 on behalf of World Wildlife Fund (the Applicant). On the basis of the completed application form, the Board has determined that the Applicant has met the technical requirements for an intervention as set out in section 22.2 of the Board's Rules of Procedure<sup>1</sup> and the Notice of Public Hearing for the "Phase 2 Development" project proposal (NIRB File 08MN053) posted on August 21, 2019. With respect to the Board's substantive review of the Applicant's intervention request, the Board has determined that the Applicant proposes to provide relevant and material information to the Board in the context of the upcoming Public Hearing. Consequently, as set out in section 22.3(d) of the Board's Rules of Procedure, the Board, by way of this letter, is providing notice to you and to the parties to this assessment process that the NIRB accepts the Applicant's request for intervention status.

As indicated in the Notice of Public Hearing, the next step for parties granted intervention status is the filing of final written submissions with the Board on or before **September 23, 2019**. The Board expects that the Applicant's final written submissions will comply with the updated requirements set out in [Appendix A](#) of the correspondence sent out August 27, 2019.

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<sup>1</sup> NIRB Rules of Procedure (September, 2009)

As indicated previously to the parties, the Public Hearing will be conducted in accordance with the NIRB's Rules of Procedure, with timelines modified as per the Notice of Public Hearing distributed on August 21, 2019. Proceedings will be facilitated by the NIRB's Chairperson, or delegate, and Board Members with decision-making responsibility for the file, with support from NIRB staff and legal counsel as required.

Should you have questions regarding the filing of your written submissions or your participation in the Public Hearing for the "Phase 2 Development" proposal, please contact Solomon Amuno, Technical Advisor II directly at (867) 983-4603 or [samuno@nirb.ca](mailto:samuno@nirb.ca) or to Cory Barker, Technical Advisor I at (867) 983-4607 or [cbarker@nirb.ca](mailto:cbarker@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

Enclosures (1)    Appendix A: *Updated* Suggested Format for Parties' Final Written Submissions

cc:                    Megan Lord-Hoyle, Baffinland Iron Mine Corporation  
                         Lou Kamermans, Baffinland Iron Mine Corporation  
                         Mary River Distribution List

APPENDIX A  
UPDATED SUGGESTED FORMAT FOR PARTIES' FINAL WRITTEN SUBMISSIONS

For each issue raised, parties are asked to include a clear reference to the volume, document, section, and/or page number in the Final Environmental Impact Statement Addendum (FEIS Addendum) and/or documents provided by the Proponent (Additional Documents) following the Technical Meeting where relevant information may be found. Parties may find efficiencies in structuring submissions by issue, and are asked, where possible, to align their submission in accordance with the ordering of materials as presented within the FEIS Addendum. A tabular presentation as provided below is requested as a means of systematically organizing comment submissions and to assist with the compilation of submissions for the next steps of the NIRB's assessment process.

**Format and File Size**

Parties must provide submissions in a fully functional, electronically searchable Word, Excel or unlocked PDF format. Noting the current constraints with respect to internet bandwidth and speed, the NIRB requests that all submissions be submitted as electronic file(s) no larger than 10 to 25 MB.

**Final written submissions must contain the following:**

**1. Executive Summary**

Submissions must contain a non-technical executive summary of the major issues identified during the review of the FEIS Addendum and Additional Documents. The summary should not exceed two pages.

The NIRB requires executive summaries be provided in English and be translated into both **Inuktitut** and **French**. Please note that parties are responsible for sourcing this translation.

**2. Table of Contents**

Submissions must contain a table of contents with sections that relate to the main headings of the FEIS Addendum for the Phase 2 Development proposal which also identify the major issues under those headings the party intends to bring forward for discussion and intends to address at the Public Hearing. Submissions may also address any other matter that the party considers relevant to the NIRB's assessment of the FEIS Addendum and/or Additional Documents.

**3. Introduction**

All submissions should contain a statement of the party's mandate and relationship to the project. Parties that have regulatory jurisdiction over the Phase 2 Development proposal must also provide a description of the party's jurisdiction as well as a list of the legislation, regulations, policies and guidelines administered by the party that are applicable to the project.

**4. Specific Comments**

For each issue included in the submissions, parties should provide the following:

- a. A detailed description of the issue and, as appropriate, a reference to where within the FEIS Addendum (volume/document, section and page number) and/or Additional Documents the issue is discussed;

- b. If provided by the Proponent within the FEIS Addendum and/or Additional Documents, identify the Proponent's conclusion(s) related to the issue;
- c. A statement regarding the conclusion(s) of the commenting party related to the issue, including reference to the justification/data/rationale supporting that conclusion;
- d. A brief discussion assessing the issue's importance to the impact assessment process; and
- e. Any recommendation(s) to the NIRB with respect to the disposition of the issue, including whether or not the issue could be addressed through specific updates to the terms and conditions of Project Certificate No. 005 and/or other modifications to the existing monitoring and reporting requirements for the approved Mary River Project.

## 5. Summary of Recommendations

Finally, submissions to the NIRB must contain a *summary* of the recommendations to the Board with respect to:

- Whether Parties agree/disagree with the conclusions presented in the FEIS Addendum or Additional Documents provided by the Proponent regarding the alternatives assessment, environmental impacts, proposed mitigation, significance of impacts, and monitoring measures – and all evidence supporting the parties' position;
- Whether or not conclusions presented in the FEIS Addendum or Additional Documents provided by the Proponent are supported by the analysis – and all evidence supporting the parties' position;
- Whether appropriate methodology was utilized in the FEIS Addendum or Additional Documents to develop conclusions – and all evidence supporting the parties' position along with any proposed alternative methodologies which may be more appropriate if applicable;
- An assessment of the quality and the presentation of the information presented in the FEIS Addendum or Additional Documents;
- An assessment of the appropriateness of proposed monitoring measures – and evidence to support the determination, along with any proposed alternative monitoring measures which may be more appropriate (if applicable); and
- Any comments regarding additional information which would be useful in assessing impacts – and reasons to support any comments made.

## 6. Suggested submission format in Table Form

<b>Review Comment Number</b>	
<b>Subject/Topic</b>	
<b>References</b> to the FEIS Addendum ( <i>i.e., volume/document, section/sub-section, page number, etc.</i> ) or Additional Documents	
<b>Summary</b> (include Proponent's conclusion if relevant and conclusions of commenting party)	
<b>Importance of issue to the impact assessment process</b>	
<b>Detailed Review Comments</b>	1. Gap/Issue 2. Disagreement with FEIS Addendum conclusion

	3. Reasons for disagreement with FEIS Addendum conclusion 4. Disagreement and reasons for disagreement with conclusions within the Additional Documents
<b>Recommendation/Request</b>	