$\Lambda^2 C^{47} P^{74} \Lambda$ POCCOC DOGOL

September 27, 2019

Serving the communities of

DPV 224P Arctic Bay

PorLAC Cape Dorset

b^oCSbDLAb Clyde River

4DYACJ6P Grise Fiord

50576 Hall Beach

 Δ^{L} Igloolik

 $\Delta^{c}b\Delta^{c}$ Igaluit

brLSc Kimmirut

Pangnirtung

LcUrc-Pond Inlet

SPPSBCSYDSB Qikiqtarjuaq

4PC2D4PQG5 Resolute Bay

50-P 2096 Sanikiluag Tara Arko

Director of Technical Services

Nunavut Impact Review Board (NIRB)

29 Mitik Street P.O. Box 1360

Cambridge Bay NU X0B 0C0

Email: tarko@nirb.ca

SENT VIA EMAIL

Re: Tusaqtavut Study Specific to Mary River Project Phase 2 Proposal for the **Communities of Igloolik and Hall Beach**

Dear Ms. Arko,

Qikiqtani Inuit Association (QIA) is pleased to provide the Nunavut Impact Review Board (the Board) with a second Tusaqtavut Study (Tusaqtavut) on the Baffinland Iron Mines Corporation's (Proponent) Mary River Project (Project) Phase 2 Proposal. The first Tusagtavut study was for the community of Pond Inlet and submitted June 14, 2019. This Tusaqtavut study is for the communities of Igloolik and Hall Beach. The study is appended to this submission.

Tusaqtavut means "what we heard" in Inuktitut. These Tusaqtavut studies are an important step toward improving the incorporation Inuit Qaujimajangit (IQ)¹ in the Board's impact assessment (IA) process of Phase 2 Proposal. QIA conducted the *Tusaqtavut* studies to help fill the gap in contextual and detailed Inuit perspectives on the Phase 2 Proposal specifically and the Project generally.

The Tusaqtavut studies are not intended to replace QIA's existing submissions on the Phase 2 Proposal to date. The studies qualify QIA's submissions on the Phase 2 Proposal related to IQ and the potential impacts of the Project on Inuit land use and occupancy. Having IQ data

¹ Please see the attached IQ Statements Document that is submitted with this letter for further particulars on the importance and significance of IQ to QIA and the Inuit of the Qikiqtani.

available through appropriate methods, such as *Tusaqtavut* studies, for consideration within the Phase 2 review process is intended to: enhance and influence project design and operation; improve mitigations and the assessment of residual effects; determinations of significance; and monitoring and adaptive management. The Study is part of the ongoing dialogue about the Project and its effects on Inuit. IQ has an important role in the whole Project, not just the review of the Phase 2 Proposal.

WHAT DID THE TUSAQTAVUT STUDY INVOLVE?

The Study was conducted by QIA with support from Firelight Research Inc. It details what we heard from 38 individual interviews conducted with 12 Inuit community members from Hall Beach and 26 Inuit community members from Igloolik in May 2019. Interviews focused on their land, water and resource uses and values in the area currently impacted by the Project or potentially by the Proponent's Phase 2 Proposal. The study has two main components: 1) digital mapping of uses and values; and 2) Inuit perspectives on what changes they have seen, what they think (and have observed) is causing the changes, and the role of the Project in those changes. The *Tusaqtavut* studies reflect Inuit words expressing their values, experiences, and concerns.

WHY THE TUSAQTAVUT STUDY?

QIA wants Inuit perspectives, and IQ, to be fully considered throughout the review of the Phase 2 Proposal. The current state of IQ data for the Project that has been gathered does not appear to be adequate: it was largely self-directed and controlled by the Proponent; the data is out-dated (especially in light of its relative age and the altered state of the Project components since the data was gathered); and the coarse scale of the mapping and infrequent use of individual interviews without any incorporation of the ongoing use of IQ in community based monitoring provides limited value. The lack of extensive, up-to-date, and detailed information gathered from Inuit by the Proponent necessitated the Study.

WHAT ARE THE STUDY'S LIMITATIONS?

The Study focused on gathering spatial and contextual data from Inuit about their values as they relate to the place they live. It is not a socio-economic study focused on benefits and risks to communities from the Project, nor was it a full effects characterization. It is limited

to a sample of the communities of Hall Beach and Igloolik.² While the Study provides a deeper dive into values, experiences, and impact predictions for Inuit from Hall Beach and Igloolik, more is required. Additional data could augment this preliminary study in recognition of the significant role IQ plays in establishing adequate baseline information, identification of key issues, predictions of effects and assessment of their significance. IQ is a valuable Inuit lens that contributes to a better IA process and outcomes.

WHAT ARE THE STUDY'S IMPLICATIONS?

The *Tusaqtavut* studies illustrates that the Proponent may have underestimated the Project's impacts on Inuit culture, land and marine use and the resources Inuit rely on. The studies also illustrates the importance of gathering up-to-date use and occupancy data and examining retrospective effects of the Project from the affected parties themselves.

Most importantly, the *Tusaqtavut* studies confirm, in more detail, many of the same concerns about impacts that Inuit and QIA have raised previously.

WHAT ARE THE NEXT STEPS?

A logical next step is to apply Inuit data and knowledge in a rigorous way to a more detailed examination of the cumulative effects of the Project on Inuit culture, resources and land use. In accordance with QIA's IQ Statements, Inuit must be involved in decision-making that affects them with IQ given due consideration in decisions that affect Inuit.

CONCLUSION

This *Tusaqtavut* study, as well as the results of the Pond Inlet *Tusaqtavut* submitted June 14, 2019, should be included in the consideration of Phase 2 effects on Inuit land use, culture and resources. These two studies seem to be the most reliable and up-to-date primary data collected in relation to Inuit land use, culture and resources from the perspective of the affected communities themselves. QIA prepared these studies for the Board and the Proponent in response to the FEIS-Addendum, when we recognized Inuit perspectives were not being adequately presented so they could receive appropriate consideration. These

² Additional input from Pond Inlet is available by way a first *Tusaqtavut* study submitted June 14, 2019.

studies should be carefully considered, the IQ within them reviewed in accordance with QIA's IQ Statements.

QIA looks forward to working with the Proponent and the Board to advance fulsome discussion on the meaningful consideration of IQ, and adequate involvement of Inuit, in the ongoing development and operation of the Mary River Project.

Sincerely,

Jared Ottenhof

Director

Department of Major Projects

Encls.

CC: Mr. Levi Barnabas, QIA Executive Committee Member, Arctic Bay

Mr. Abraham Qammaniq, QIA Community Director, Hall Beach

Mr. Johnny Malaya Kublu, QIA Community Director, Igloolik

Mr. Celestino Uyarak, Mayor, Igloolik

Mr. Simonie Issigaitok, HTO Chair, Igloolik

Mr. Merlyn Recinos, Phase 2 Working Group, Igloolik

Mr. Jaypeetee Audlakiak, Mayor, Hall Beach

Mr. Jopie Kaernerk, HTO Chair, Hall Beach

Ms. Megan Lord-Hoyle, Vice-President Sustainable Development

Ms. Udlu Hanson, Vice-President Community and Strategic Development