



**NIRB File No.: 18EN026**  
NPC File No.: 148801

June 8, 2018

Megan Lord-Hoyle  
Baffinland Iron Mines Corporation  
2275 Upper Middle Rd East Suite 300  
Oakville ON L6H 0C3

Sent via email: [megan.lord-hoyle@baffinland.com](mailto:megan.lord-hoyle@baffinland.com) and [rcook@knightpiesold.com](mailto:rcook@knightpiesold.com)

**Re: Opportunity to address comments received regarding Baffinland Iron Mines Corporation's "Eqe Bay Exploration Program" project proposal**

Dear Megan Lord-Hoyle:

On April 17, 2018 the Nunavut Impact Review Board (NIRB or Board) received a referral to screen Baffinland Iron Mines Corporation's (Baffinland) "Eqe Bay Exploration Program" project proposal from the Nunavut Planning Commission (NPC or Commission). On May 9, 2018 the NIRB circulated a public notice of the screening for this project, inviting interested parties to provide comments directly to the NIRB by May 30, 2018.

On or before May 30, 2018 the NIRB received comments from the following interested parties:

- Qikiqtani Inuit Association (QIA)
- Government of Nunavut (GN)
- Environment and Climate Change Canada (ECCC)
- Fisheries and Ocean Canada (DFO)
- Indigenous and Northern Affairs Canada (INAC)

All comment submissions received by the NIRB relating to this project proposal can be obtained from the NIRB's online public registry at [www.nirb.ca](http://www.nirb.ca) by using any of the following search criteria:

- Project Name: Eqe Bay Exploration Program
- NIRB File No.: 18EN026
- Application No.: 125336

A *summary* of the public concerns reflected in the comment submissions relate to the following:

- Lack of completed mitigation and environmental monitoring plans, including Closure and Reclamation Plan to address potential environmental concerns from the exploration program;

- Insufficient information on the possible impacts of the proposed project activities on Polar Bears and caribou populations;
- Potential for adverse environmental impacts from disposal of drilling fluids and muds, and effects on vegetation and wildlife;
- Potential for wetland discharge to cause communicable diseases that may be transmitted to human and/or wildlife;
- Potential impacts to suspected archaeological sites within the project area;
- Lack of technical drawings and hydrological reports;
- Potential for disturbance to migratory birds during vegetation clearing activities and recommended that activities be conducted outside of the migratory bird nesting season in order to avoid incidental take;
- Lack of information on exploration specific waste management and spill contingency plan in their Type “B” Water Licence Application to the Nunavut Water Board (NWB);
- No quarry specific management plans were provided that detailed the acid rock drainage and metal leaching assessment once they are developed as part of the NWB’s water licence process;
- Lack of information on how the proposed project would benefit the local economy;
- Potential for disturbance to sensitive wildlife species from air traffic; and
- No information provided on whether the Proponent would be applying for access to Inuit Owned Lands Land Use Licence.

The NIRB would like to provide Baffinland with an opportunity to address the comments as received, and provide all the required additional documents including mitigation and environmental monitoring plans relevant to the proposal prior to the Board rendering its determination for this screening assessment and issuing its subsequent Screening Decision Report to the responsible Minister(s). The NIRB respectfully requests that a response be provided directly to the NIRB by **June 22, 2018**.

If Baffinland determines that the time required to supply a written response is significantly greater than two (2) weeks, the Board requests written notification and an anticipated date for submission be provided as soon as possible.

Please send any forthcoming submissions directly to the NIRB at [info@nirb.ca](mailto:info@nirb.ca), or through the online public registry at [www.nirb.ca](http://www.nirb.ca).

If you have any questions or require clarification, please contact the undersigned directly at (867) 983-4603 or [samuno@nirb.ca](mailto:samuno@nirb.ca).

Sincerely,



Solomon Amuno, PhD  
Technical Advisor  
Nunavut Impact Review Board

cc: Karén Kharatyan, Nunavut Water Board  
Stephen Williamson Bathory, Qikiqtani Inuit Association  
Salamonie Shoo, Qikiqtani Inuit Association  
Alexander Stubbing, Government of Nunavut – Department of Culture and Heritage  
Sylvie LeBlanc, Government of Nunavut – Department of Culture and Heritage  
Tracey McCaie, Indigenous and Northern Affairs Canada  
Georgina Williston, Environment and Climate Change Canada  
Mark D'Aguiar, Fisheries and Oceans Canada