



February 27th, 2012

Serving the
communities of

 $\Delta^b \wedge \Delta^c \preceq^b$

Arctic Bay

 $\rho^{\alpha\beta}, \Delta^C$

Cape Dorset

[illegible]

Clyde River

◀▶ ↻ ⌂

Grise Fiord

4054b

Hall Beach

 $\Delta^L \supseteq \Delta^b$

Igloolik

$$\Delta^q \hookrightarrow \Delta^c$$

Iqaluit

PLGPC

Kimmirut

 $\langle \sigma^z \rangle$

Pangnirtung

Γ^cΠLC_c^b

Pond Inlet

99% C₉Δ₉

Qikiqtarjuaq

962742

Resolute Bay

ኢሮፖጋፋፍ

Sanikiluag

Ryan Barry
Executive Director
Nunavut Impact Review Board
29 Mitik, PO Box 1360
Cambridge Bay, NU
X0B0C0

Mr. Barry,

Re: Baffinland Iron Mines Corporation's 2012 Work Plan Application

The Qikiqtani Inuit Association (QIA) would like to thank the Nunavut Impact Review Board (NIRB) for providing the opportunity to provide comments on Baffinland Iron Mines Corporation's (BIMC) proposed 2012 Work Plan. In conducting a review of the application, QIA has taken the following points into consideration:

- Determination of whether or not Parties agree/disagree with the conclusions in the NLCA 12.10.2(b) application package regarding the alternatives assessment, environmental impacts, proposed mitigation, significance of impacts, and monitoring measures – and reasons to support the determination;
- Determination of whether or not conclusions in the NLCA 12.10.2(b) application package are supported by the analysis – and reasons to support the determination;
- Determination of whether appropriate methodology was utilized in the NLCA 12.10.2(b) application package to develop conclusions – and reasons to support the determination, along with any proposed alternative methodologies which may be more appropriate (if applicable);
- Assessment of the quality and presentation of the information in the NLCA 12.10.2(b) application package; and
- Any comments regarding the expressed need for and required timing of the proposed exceptions as presented within the NLCA 12.10.2(b) application package – and reasons to support any comments made.







5





ለፖርቱጋል
ወርሃው ልማት
Serving the
communities of

$\Delta^b \wedge \nabla^c \prec^b$
Arctic Bay

$\rho^{a,q} \cup \Delta^c$
Cape Dorset

Clyde River

Grise Fiord

Hall Beach

Δ^lΔ^b
Igloodik

$\Delta^b \rightarrow \Delta^c$
Iqaluit

ᐱᓚᓂᕈᑦ
Kimmirut

$\langle \sigma^{\alpha} \rangle_{\alpha}$
Pangnirtung

Pond Inlet

Qikiqtarjuaq

ᑭᐅᓴᓴᓴᓴ
Resolute Bay

Sanikiluaq

- k. Steensby Site – Fuel barge. A 10 ML fuel barge is proposed to overwinter in Steensby Inlet. Fuel transfer from the barge to land will occur. **It is requested that Transport Canada (and any other regulatory authority) provide advice on the acceptability of this practice. The regulatory and enforcement authority responsible for overwintering of fuel barges is requested. It is requested that the regulatory authority provide approval of the operation and spill response plans required to support this activity. It is requested that the application, along with the approved permit/licence, to obtain approval of overwintering of fuel barge and transfer of fuel on ice to land is provided on the public record.**
- l. Steensby Site – Fuel barge. Overwintering of fuel in a barge within Steensby Inlet is an item of significant public concern. **The acceptability of this practice by Nunavut communities is requested to receive high priority in this determination of significance.**

Finally, in conducting the review of this application QIA found the amount and type of materials in Inuktitut was limited. As a result QIA undertook to prepare additional Inuktitut materials in order to facilitate local Committee meetings. Given the additional review time provided by NIRB, QIA was able to accommodate developing additional Inuktitut materials internally without requesting an extension to the review period. QIA encourages Baffinland to interact prior to submissions to ensure that the type and amount of materials submitted do not present difficulties or barriers for community participation.

Should you have any questions or comments please do not hesitate to contact Stephen Williamson Bathory (Director of Major Projects), Solomon Awa (Project Coordinator), or, myself.

Sincerely,

Bevenidge

Navarana Beveridge
Executive Director

cc- Dionne Filiatrault, Executive Director, Nunavut Water Board

Attachments, Appendix A: Mary River Project Committee Community Meeting Notes