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Qikiqtani Inuit Association

NIRB File No.: 18EN026

June 1st , 2018

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Solomon Amuno
Technical Advisor II
Nunavut Impact Review Board

Via email: info@nirb.ca and samuno@nirb.ca

RE: Notice of Screening for Baffinland Iron Mines Corporation's "Eqe Bay Exploration Program" Project Proposal.

On May 9, 2018, the Nunavut Impact Review Board (NIRB) issued a request for comments regarding Baffinland Iron Mines Corporation's (the "Proponent") "Eqe Bay Exploration Program" Project Proposal. The Qikiqtani Inuit Association (QIA) would like to thank NIRB for providing the opportunity to comment on this proposal.

The QIA has developed a number of comments on the Eqe Bay proposal, included here as Appendix A. Chief among these concerns is a lack of information provided by the Proponent in its application.

The ambiguity and conflicting statements in the described geographic and seasonal extent of the Project make it difficult to understand what is being proposed, where, when, and for how long. QIA must assume that the Proponent will undertake maximum level of activity proposed, and finds the application contains insufficient information to assess the proposed activity.

The entirety of the "Environmental Management" section is either missing or references material developed for a different Project. QIA recognizes similarities in the operating environment for Eqe Bay and the Mary River Project, but the Proponent fails to provide information on which portions of the Mary River impact management plans "will be applied as appropriate" to Eqe Bay or how this will be accomplished. QIA requests that the Proponent develop specific plans for the proposed activity and submit these for review by the NIRB and stakeholders.

QIA is also concerned that the Proponent has not submitted an application to QIA for use of Inuit Owned Lands. Additional information, a review by QIA, description of security and

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P.O. Box 1340, Iqaluit, Nunavut, X0A 0H0 • Phone: (867) 975-8400 • Toll Free 1 800-667-2742 • Fax: (867) 979-3238 • Website: www.qia.ca

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community engagement will be required before a permit is issued. Doing so will take time and the Proponent is encouraged to begin this process as soon as possible.

QIA and Baffinland have been working together to improve Inuit employment and contracts with Inuit firms in Mary River operations. However, QIA is concerned about the lack of effort by the Proponent to include Inuit participation in the Eqe Bay Project. Baffinland's record of initial meetings with Inuit in Sanirajak (Hall Beach) and Igloolik demonstrates the importance of local employment in these communities, but Baffinland has made no commitment to hire or train local Inuit or contract Inuit firms. QIA recommends Baffinland commit to training and hiring local Inuit to work on its Eqe Bay Project. Should the exploration not lead to further development, these trained Inuit would then be available to support the growing needs of the Mary River project.

Again, QIA appreciates the opportunity to review and provide comments through the NIRB's screening process and remains committed to participating in the review of this and other projects in the region. QIA looks forward to seeing the additional information provided by the Proponent for the Eqe Bay Exploration Project.

Sincerely,

Rosanne D'Orazio
Director, Lands & Resources

Appendix A: 180530-QIA-REG-18EN026-Appendix A Comments Table.docx

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