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Qikiqtani Inuit Association

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Sanikiluaq

NIRB File No.: 18EN026

July 20, 2018

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

Thank you for providing the Qikiqtani Inuit Association (QIA) with the opportunity to continue commenting on Baffinland Iron Mines Corporation's (Baffinland or Proponent) Eqe Bay Exploration Program Proposal (Proposal).

QIA's original, June 1, 2018 submission to the NIRB on the Eqe Bay Proposal included several comments and/or concerns that focused primarily on deficiencies in information associated with the Proposal. However, most of the concerns and/or comments the QIA provided in respect of the Proposal remain unaddressed in Baffinland's responses. This outstanding information not only continues to impede the QIA's ability to undertake a thorough and complete assessment of any significant adverse impacts and effects potentially linked to the Proposal but it also limits the QIA's commitment to provide meaningful representation or intervention in context of the NIRB's public review process for the Proposal.

Recognizing the significant scope of activities associated with the Proposal and the extent of outstanding information required to undertake a through and critical review, the QIA has significant concerns and reservations at this stage about the NIRB's potentially allowing this Proposal to proceed in the absence of the requested information.

The QIA concurs that aspects of the information required and requested for the Proposal may also be required for regulatory processes subsequent to that of the NIRB's. The Proponent, however, should not be allowed to use this as a basis for postponing, to later dates and processes, requirements critical to the NIRB's review process, as such information

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P.O. Box 1340, Iqaluit, Nunavut, X0A 0H0 • Phone: (867) 979-5391 • Toll Free 1 800-667-2742 • Fax: (867) 979-3238 • Website: qikiqtani.nu.ca

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may be considered under different contexts and for distinct purposes during other regulatory processes. Additionally, the information requested is consistent to that included/provided for a similar Proposal that proceeded through the NIRB's review process in the past.

Consequently, QIA asks that the NIRB ensure Baffinland provides the required information and documentation prior to finalizing the review of this Proposal. QIA understands there are specific NIRB requirements to which all proponents are required to adhere, that management plans be available for the purpose of determining potential eco-systemic and socio-economic impacts related to a project.

Attached to this letter (Appendix A) are specific QIA responses to Baffinland's response to QIA comments. QIA would like to thank the NIRB, again, for providing this opportunity to address some concerns up front but it may be time for NIRB to make a determination on the minimum level of information required for screening such a large-scale Proposal.

If you have any questions related to the above, please contact the undersigned at your convenience.

Regards,

Karen Petkau
Acting Director, Lands and Resources
FOR
Rosanne D'Orazio
Director, Lands and Resources

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