

Mittimatalik HTO

Comments on Mary River Sustaining Operations Proposal

Amendment #5

Submitted July 19, 2023





Mittimatalik Hunters and Trappers Organization

- Nunavut Agreement s. 5.7.3: the MHTO is responsible for the regulation of harvesting practices and techniques among members including among other things, the management of harvesting by our members.
- MHTO has considered impacts the Sustaining Operations proposal may have on wildlife, and how this could affect or limit our ability and rights to harvest now, and the ability and right of future generations' to do the same



Summary of Issues

- Baffinland is rushing through again. The federal Ministers and NIRB support Baffinland's request to rush through the assessment process. MHTO has not been treated fairly.
- Baffinland did not have any public community consultation meetings held to find out acceptability of SOP, for Baffinland to keep operating at 6 MT per year, or about impacts and additional mitigations we want to see
- Baffinland still saying no significant impact to caribou and marine mammals - MHTO disagrees
- Baffinland has not conducted an assessment of impacts to Inuit harvesting rights
- Baffinland has not incorporated Inuit Qaujimajatuqangit (IQ) in its assessment of impacts from current and ongoing operations
- Baffinland is being allowed to "project split" - keep submitting 2 year applications instead of a full assessment of a 6-8 year mine development through the northern route
- Baffinland is not prepared to answer questions about significance, impacts, and mitigation



Summary of Issues

- Baffinland has not updated its cumulative effects assessment to look at 6-8 years of this level of operations, and what happens in the future
- Baffinland does not have a plan to assess impacts to Inuit harvesting activities
- Baffinland has not provided additional mitigation measures for impacts to caribou from continued operations at 6 MT per year and transportation of hundreds of trucks per day on the Tote Road
- Baffinland has not included Inuit harvesting as a valued component in its assessment, and it has no indicators and thresholds which could appropriately measure impacts to Inuit harvesting
- MHTO does not agree with BIM's findings regarding no significant residual impacts of sustained road use to caribou
- MHTO has no certainty regarding the impacts the SOP may have on Inuit harvesting rights related to caribou or narwhal



Summary of Issues

- MHTO does not know whether impacts of marine shipping on Inuit rights can be mitigated, or what measures will be taken to mitigate those impacts
- BIM has not shown how its plans to ship ore can be adapted to address impacts to Inuit rights and still meet its production targets and economic viability required for SOP (this remains true for the approved project)
- MHTO does not agree that ships should be moving through the RSA beyond October 15th
- Use of Ragged Island as anchorage site is not supported by the MHTO or Inuit but continues to be accessed by Baffinland despite our protests
- MHTO does not have the information or confidence needed to support the SOP - the MHTO Board passed a motion recommending the NIRB **reject the SOP at this time**

