

ATTACHMENT 4

QIA Pond Inlet Letter to Responsible Ministers September 21, 2018

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September 21st, 2018

Honorable Minister LeBlanc
Minister of Intergovernmental Affairs, Northern Affairs and Internal Trade
House of Commons
Ottawa, Ontario, Canada
K1A 0A6

Re: Nunavut Impact Review Board, 2018 Production Increase Application (August 31, 2018).

Dear Honorable Minister LeBlanc,

This correspondence is intended to provide a joint community response to the “Nunavut Impact Review Board’s Reconsideration Report and Recommendations, Production Increase Proposal, Baffinland Iron Mines Corporation (August 31st, 2018)” (the “NIRB Recommendation”). This letter conveys our position that the 2018 Production Increase Application, and its associated impacts, monitoring programs and mitigation measures, are reasonable particularly when considered in light of the QIA / BIM “Project Stabilization Approach” (more on this below). The signatories of this letter met numerous times in Pond Inlet regarding the 2018 Production Increase Application. We feel this letter accurately reflects our shared understanding. We would like to share our concerns regarding the NIRB Recommendation. The recommendation to reject the 2018 Production Increase Application by NIRB creates unnecessary risk for the Mary River Project while the project revenues remain sparse. Those risks to Mary River then risk regional interests, proposed impact monitoring and mitigation measures and enhanced Inuit benefits.

In this letter we are addressing the request to transportation additional iron ore during the present shipping season (11 additional vessels), and, the request to permanently increase the annual limit for iron ore transportation to six million tons per year.

We have a strong interest in seeing the project advance through the Production Increase Application in a manner that supports the realization of Inuit aspirations in the region and helps the company operate revenue positive. The joint QIA / BIMC “Project Stabilization Approach” during 2018 targeted addressing specific Inuit concerns related to the early years of Mary River Project. This resulted in re-commitment by BIMC to improved delivery of Inuit benefits to affected communities through the current IIBA, improved delivery of a \$20 million dollar training and employment program under the Skills Partnership Fund (administered by Employment and Social Development Canada). The Project Stabilization Approach also resulted in the negotiation of important enhancements to the IIBA, commitments that are in jeopardy by the NIRB Recommendation. In relation to the 6.0MT operation, additional IIBA enhancements have been negotiated for Pond Inlet in particular, such as an expanded wildlife compensation regime. Additionally, recent site visits to Mary River with the community have already been held to start advancing improvements to monitoring and mitigation of dust and hunter access to the project area.

Our submissions to NIRB contained detailed explanations of the formal commitments reached as a result of the Project Stabilization Approach. These commitments address specific issues of concern, including terrestrial and marine impacts, and provide direction to improve monitoring activities through collaborative oversight not seen before in Nunavut. The Project Stabilization Approach produced the

outline of a renegotiated IIBA that will both stabilize and expand Inuit benefits for the region. These regional benefits could be lost if the viability of the Mary River Project is undermined by the current Project Certificate terms and conditions limiting the annual production level. We feel that NIRB did not give its full attention to the presentation of commitments advanced by Inuit and committed to by the proponent.


Please note that it is a serious concern for Inuit that NIRB, the party tasked with monitoring project certificates it issues, is not adequately resourced to fulfill an adequate monitoring role for projects permitted in Nunavut. Without additional NIRB resources, concerns raised may not be properly reviewed leaving Inuit who experience direct project impacts frustrated and without confidence as to whether the proponent's commitments are being lived up to. The recommendation before you may not have had NIRB's full attention to appreciate the scope of proposed monitoring and mitigation measures, and, enhanced Inuit benefits.

With respect to the 2018 shipping season, we believe the additional transportation of iron ore from Milne Inlet (11 vessels) will not result in significant negative impacts. We also believe adequate monitoring and mitigation plans are in place to oversee these additional activities.

With respect to a permanent increase in iron ore transportation from Milne Inlet we believe the NIRB Recommendation should be varied, and the 2018 Production Increase Application, specifically the increase in iron ore production limits, should be accepted with revised conditions. The outcomes and commitments from the Project Stabilization Approach represent a significant and meaningful improvement for Inuit interests in the region surrounding the Mary River Project. If the NIRB Project Certificate for Mary River is not varied, we are concerned regional benefits would be lost.

Signed,

Mr. Caleb Sangoooya
MHTO



Mr. Joshua Katasak
Hanlet, Pond Inlet

Mr. David Curley
QIA Board Member, Pond Inlet



Mr. Levi Barnabas,
QIA Executive Committee
Mary River IIBA Co-Chair



CC: Honorable Joe Enook, MLA Pond Inlet

ANNEX A:
SUMMARY OF BENEFITS AGREED UPON DURING RENEGOTIATION OF THE MARY RIVER IIBA.

1. QIA and BIM have an agreement in principle regarding a renegotiated IIBA with changes to Inuit Benefits, Inuit Engagement, Governance, and Monitoring and Enforcement. Inuit Benefits includes a focus upon direct project opportunities and benefits such as Inuit training, employment and contracting. This document is before the parties for final review. Approval was anticipated in October following the 2018 Production Increase Application. Notable inclusions in the renegotiated IIBA related to Inuit training, employment:
 - a. A commitment of \$10 Million toward the establishment of a Regional Training Centre in Pond Inlet. Efforts are already underway to complete a feasibility design and study for this facility, including locating the building on Inuit Owned Lands.
 - b. A commitment to spend \$2.25 million on training Inuit between 2019-2021 and a commitment to spend \$1.5 million per annum until 2031.
 - c. A commitment to hiring and providing local counselling services in Pond Inlet, Arctic Bay, Clyde River, Igloolik and Hall Beach.
 - d. A commitment to resourcing lunch programs in schools in Pond Inlet, Arctic Bay, Clyde River, Igloolik and Hall Beach.
 - e. An expanded Inuit Human Resource Strategy,
 - i. Hiring of 5 additional staff to implement this strategy (Inuit Human Resource Advisors and Recruiters).
 - ii. Permanent dedicated “Work Ready Program” to be delivered throughout the region
 - iii. Inuit Internship Program targeting employment outside trades and heavy equipment.
 - iv. An Inuit Employment Target of 50%.
 - f. Increased resources for a “Community Wellness Fund” which will provide up to \$1.1M/annum to the communities of Pond Inlet, Arctic Bay, Clyde River, Igloolik and Hall Beach.
2. Specific to the 2018 Production Increase Application, QIA and the proponent have also negotiated an expanded Wildlife Compensation regime under the IIBA. This regime includes the following:
 - a. Wildlife Compensation Fund.
 - i. A life of mine commitment to provide direct compensation for specific incidents of loss or damage for Inuit harvesters.
 - ii. Value \$750,000.
 - b. Enabling Fund
 - i. A commitment to provide resources to enable improved hunting and Inuit enjoyment of the project area through the establishment of a gas program. This will support improved affordability of local travel by Inuit.
 - ii. Value \$400,000/year for 10 years. Revisited thereafter.
 - c. Project Monitoring Fund
 - i. Dedicated resources to support independent community based monitoring of project impacts, supplies communities with equipment to monitor and enjoy the marine environment. Projects will be developed and run by the community.
 - ii. Value \$200,000/year for 10 years. Revisited thereafter.
 - d. Marine Equipment Program
 - i. A program whereby every three years the proponent will purchase and subsequently donate to communities a fully-equipped research vessel.
 - ii. Vessels will be given to Pond Inlet, Arctic Bay, Clyde River, Igloolik and Hall Beach.
 - iii. Value \$300,000 per vessel.

**ANNEX B:
SUBMISSIONS MADE BEFORE THE NUNAVUT IMPACT REVIEW BOARD**

Through formal representations filed with NIRB in response to the 2018 Production Increase Application QIA made submissions to NIRB that addressed concerns related to the application and information about BIM commitments.

QIA and the community of Pond Inlet jointly developed a table of topics that were raised during review of the 2018 Production Increase Application. This table included the following topics: Shipping, Dust, Management Plan Updates, Water Compensation Agreement, Inuit Owned Lands Commercial Lease, Roads Management Plan, Current IIBA Implementation, IIBA Renegotiation. On July 11th, 2018 this list was supplied to NIRB prior to the NIRB led community engagement session.¹

On July 16th, the proponent responded to the table of topics and confirmed its commitment to addressing each of the topics listed.² This response was supplied to NIRB during the formal review of the 2018 Production Increase Application. This response included a pledge from the proponent to resource and undertake bi-annual third-party performance audits of the commitments made by the proponent under both the IIBA and the NIRB Certificate, including developing immediate action plans for any topics identified through the audit process.

In addition to the table of commitments, on July 26th, 2018 QIA also presented final technical review comments to NIRB.³ In this submission submitted a list of 45 specific recommendations addressing the following topics; Aquatic Wildlife and Habitat, Terrestrial Wildlife and Habitat, Regulatory Permitting and Engineering, and, Socio-Economics.

On August 9th, 2018 the proponent responded to QIA's final technical review with responses to each of QIA's 45 recommendations. address these commitments was submitted to NIRB.⁴

¹ Qikiqtani Inuit Association, Hamlet of Pond Inlet, Mittimatalik Hunters and Trappers Organization. Letter to Nunavut Impact Review Board. NIRB Review Process, BIMC's 2018 Production Increase Application. July 11th, 2018.

² Baffinland Iron Mines Corporation. Letter to Nunavut Impact Review Board. July 16th, 2018.

³ Qikiqtani Inuit Association. Letter to Nunavut Impact Review Board. NIRB Review Process, BIMC's 2018 Production Increase Application. July 26th, 2018.

⁴ Baffinland Iron Mines Corporation. Letter to Nunavut Impact Review Board. August 9, 2018.

ANNEX C:
BAFFINLAND IRON MINES CORPORATION MONITORING, MITIGATION AND ADAPTIVE
MANAGEMENT COMMITMENTS. 2018 PRODUCTION INCREASE.



MEMORANDUM

Baffinland Environmental Monitoring, Mitigations and Adaptive Management Overview

Approach to Adaptive Management

Baffinland Iron Mines Corporation (Baffinland) has invested significant efforts in 2018 to further enhance our understanding of the Qikiqtani Inuit Association (QIA) and local community member's concerns related to the current Project and their specific concerns with increasing production and shipping rates to support economically sustainable growth of the Project.

Existing permits requires that Baffinland receives input from QIA, the community (namely Pond Inlet) and other regulators on the results of annual monitoring conducted by Baffinland to confirm the predictions of the Final Environmental Impact Statement for the Project. In addition, Baffinland solicits feedback directly from the communities and other concerned parties to inform operational planning. Feedback from these stakeholders is provided by establishing several different avenues for two-way information sharing (see Table 1). Despite the above efforts, it is acknowledged that there remains some ongoing concerns amongst community members and QIA about the Project and uncertainty in the results in the monitoring programs. To address this Baffinland has implemented a process to develop adaptive management measures and additional mitigations (Figure 1). The adaptive management process allows for Projects-effects monitoring to be assessed at two levels.

First, Project-effects monitoring is conducted and assessed by Baffinland's technical experts and consultants. The results of the monitoring programs are then shared with and assessed by external reviewers and technical specialists, the QIA and local community members.

Table 1 – Project Review Process

Information Sharing Activity	Description	Annual Schedule	Key Organization							
			Nunavut Impact Review Board (NIRB)	Nunavut Water Board (NWB)	QIA	Regulatory Authorities	Working Groups (Government of Nunavut, Department of Fisheries and Oceans, Parks Canada, Environment and Climate Change Canada, Qikiqtani Inuit Association, Mittimatalik Hunter and Trappers Organization)	Technical Experts	MHTOs	Hamlets
Annual Monitoring Program Reports - Draft	Draft report – Results from annual monitoring program for terrestrial and marine monitoring efforts	February 15			✓	✓	✓	✓	✓	
Annual Monitoring Program Reports - Final	Final report – Results from annual monitoring program for terrestrial and marine monitoring efforts. Incorporates feedback received from Working Groups on the draft report	March 31	✓	✓	✓	✓	✓	✓	✓	✓
NIRB/NWB Annual Reports	Summarizes annual operational activities, monitoring programs and compliance with regulatory permits	March 31	✓	✓	✓	✓	✓	✓	✓	✓

Information Sharing Activity	Description	Annual Schedule	Key Organization							
			Nunavut Impact Review Board (NIRB)	Nunavut Water Board (NWB)	QIA	Regulatory Authorities	Working Groups (Government of Nunavut, Department of Fisheries and Oceans, Parks Canada, Environment and Climate Change Canada, Qikiqtani Inuit Association, Mittimatalik Hunter and Trappers Organization)	Technical Experts	MHTOs	Hamlets
Topic Specific Meetings – Shipping etc.	Face-to-face meetings held with MHTO, Hamlets and QIA Representatives to discuss specific issues and concerns and/or key components of Project operations	End and beginning of shipping season, As needed			✓			✓	✓	
General Project Update Meetings	Annual meetings held with Inuit and QIA representatives to update interested parties on ongoing operations or any proposed changes to the Project	Annually, As needed	✓	✓	✓	✓	✓	✓	✓	✓
Site Visits	Visit to the Mary River and Milne Port site to see live operations and discuss issues on the ground	As needed or requested						✓	✓	✓

Information Sharing Activity	Description	Annual Schedule	Key Organization							
			Nunavut Impact Review Board (NIRB)	Nunavut Water Board (NWB)	QIA	Regulatory Authorities	Working Groups (Government of Nunavut, Department of Fisheries and Oceans, Parks Canada, Environment and Climate Change Canada, Qikiqtani Inuit Association, Mittimatalik Hunter and Trappers Organization)	Technical Experts	MHTOs	Hamlets
Inspections/ Audits	Regulatory audits or inspections to ensure compliance with existing permits and approvals	Typically during summer (July to September)	✓	✓	✓	✓				
Participation in Monitoring Programs	Contract employment opportunity or joint-collaboration on environmental monitoring programs	Summer Field Season (July to October)				✓		✓	✓	
Input into additional mitigation measures	Submission of technical comments and responses or face-to-face meetings to discuss proposed revisions or additions to existing mitigation measures	As needed	✓	✓	✓	✓	✓	✓	✓	✓

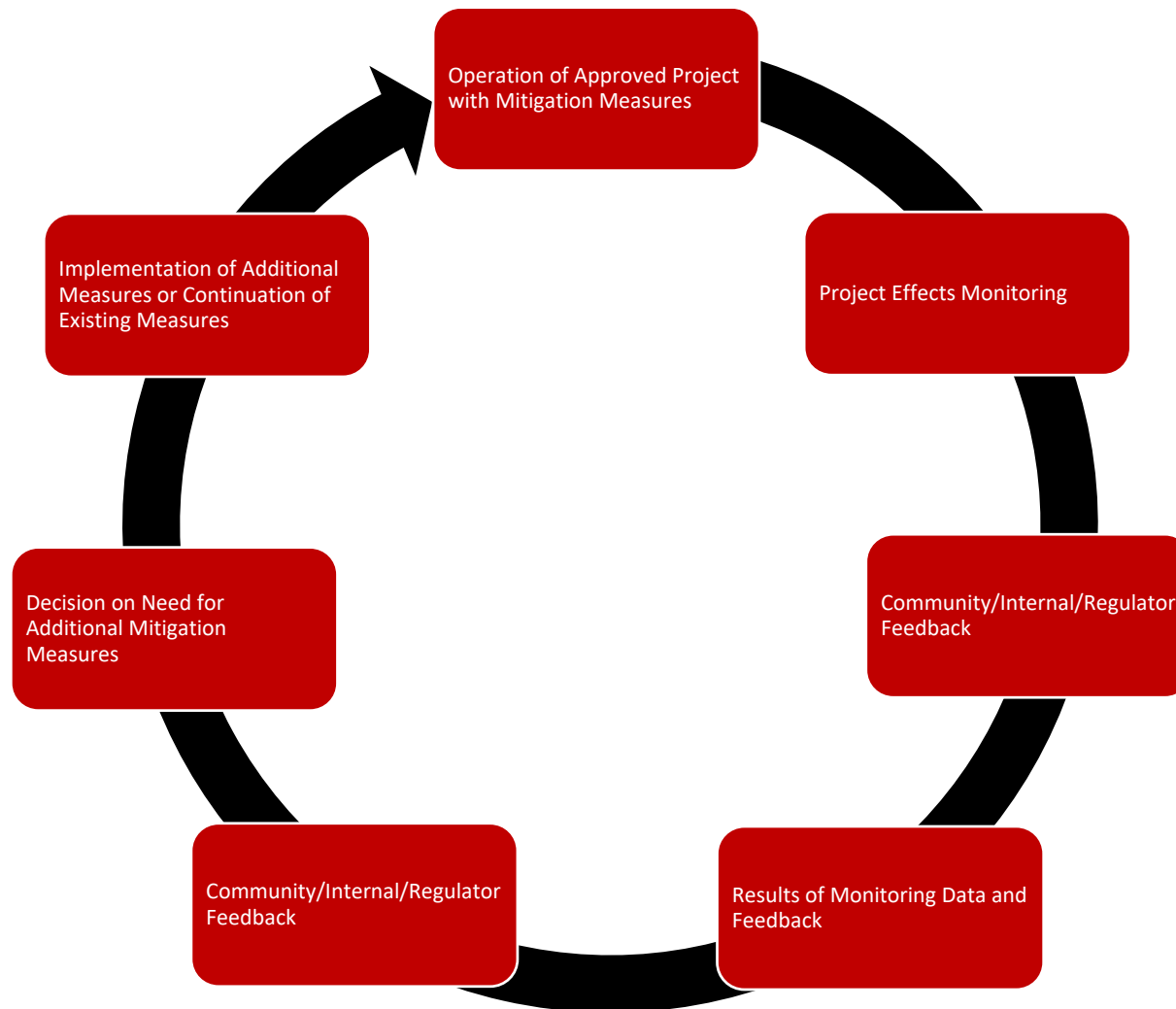


Figure 1 – Baffinland’s Adaptive Management Process



Response to Community Concerns

As previously mentioned, while the monitoring results have indicated that the Project is not having a significant or harmful effect on the environment, subsequent assessments conducted by community members and the QIA have identified a lack of certainty in the results of the monitoring programs and concerns related to Project operations. Therefore, throughout 2017 and 2018, Baffinland in consultation with the QIA and Mittamatalik Hunter and Trappers Organization (MHTO / Pond Inlet Hunter and Trappers Organization) determined that additional mitigation measures should be developed and implemented, which ensure a precautionary approach is being applied in Project operations.

In 2018, prominent attention was given by Baffinland to develop additional mitigations and monitoring that meaningfully responds to QIA and Pond Inlet community member's concerns related to shipping operations, marine mammals and dust fall. An overview of the results of the implementation of the adaptive management process executed by Baffinland is presented in Table 2.

Table 2 – Marine and Dust Effects, Monitoring and Mitigation

Topic	Potential Effect	Pre-2018 Management Plan Mitigations and Commitments	Monitoring Program	Summary of Monitoring Results and Community and QIA Feedback	Additional Mitigation Measures	Reference to commitments made through the NIRB reconsideration process and public record
Marine Mammals	Acoustic Disturbance	As listed in the Shipping and Marine Wildlife Management Plan (2016): 1. Maintain constant course and speed when possible 2. Reduce vessel idling time at dock 3. Shipboard and Marine Wildlife Observers to be on select vessels to monitor interactions with marine mammals	<ul style="list-style-type: none"> Automated Information System – Exact Earth Notifications Bruce Head Vessel-Based Project Ship- Based Observer Program Tremblay Sound Narwhal Tagging Program /Aerial Survey 	Marine mammals experience temporary and localized disturbance as a result of Project shipping	<ol style="list-style-type: none"> Reduce Vessel Speed to 9 knots within Milne Inlet Apply speed limit to all Project vessels Communicate speed limits to vessel captains through Standing Instructions to Masters (not only ore carriers) Avoid deviation from nominal shipping route Monitor adherence to speed limit and deviation from nominal shipping route through Community-Based Monitoring (installation of Automated Information System at MHTO office) and Exact Earth Notification Alert System Minimize multi-vessel transits within the corridor Avoid sensitive areas that contain critical habitat and/or traditional calving ground Work with the MHTO to establish parameters for drifting areas to avoid interaction with important hunting areas in the Inlet Provision of fuel in the amount of \$300,000 annually to enable hunting practices (up to 10 years) Provision of \$200,000 annually to support community based monitoring and research (up to 10 years) Provision of research vessel to support community initiatives (i.e. monitoring/research etc.) 	<p>Response to final written submissions on the Mary River Modification Application – Production Increase, Fuel Storage, and Milne Port Accommodations (Baffinland 2018a): Response to DFO Comment No. 1 Response to QIA Comment No. 3 Response to QIA Comment No. 4 Response to WWF No. 6 Appendix A Community Fact Sheet “Learn more about Baffinland’s shipping and marine monitoring programs”</p> <p>Nunavut Impact Review Board Process Guidance – Production Increase Proposal – Additional Information Requirement (Baffinland 2018b) Response to Comment No. 7 a) and c) –</p> <p>BIM / QIA Resolutions and Commitments (Baffinland 2018c) Response to Concern No. 4 Response to Concern No. 5 Response to Concern No. 10</p>
	Change in animal distribution in the region		<ul style="list-style-type: none"> Automated Information System – Exact Earth Notifications Bruce Head Vessel-Based Project Ship-Based Observer Program 	Relative population levels (distribution and abundance) are not being affected by the Project Marine mammals tend to avoid vessels		
	Change in abundance in the region		<ul style="list-style-type: none"> Automated Information System – Exact Earth Notifications Bruce Head Vessel- Based Project Ship-Based Observer Program 	No ship-strikes have been recorded to date Community members have expressed an ongoing concern for how noise from vessels could be affecting marine mammals or driving them out of the Project area		
	Alteration of migration patterns		<ul style="list-style-type: none"> Automated Information System – Exact Earth Notifications Bruce Head Vessel-Based Project Tremblay Sound Narwhal Tagging Program /Aerial Survey 			
	Availability of marine mammals for harvesting	As listed in the Shipping and Marine Wildlife Management Plan (2016): 1. Maintain constant course and speed when possible 2. Reduce vessel idling time at dock 3. Shipboard and Marine Wildlife Observers to be on select vessels to monitor interactions with marine mammals	<ul style="list-style-type: none"> Bruce Head Vessel- Based Project Tremblay Sound Narwhal Tagging Program Ship-Based Observer Program 	Relative population levels (distribution and abundance) are not being affected by the Project No ship-strikes have been recorded to date Local hunters have reported decreased numbers of marine mammals available for harvesting		

Topic	Potential Effect	Pre-2018 Management Plan Mitigations and Commitments	Monitoring Program	Summary of Monitoring Results and Community and QIA Feedback	Additional Mitigation Measures	Reference to commitments made through the NIRB reconsideration process and public record
		As listed in the Inuit Impact Benefit Agreement (2013): 4. Wildlife Compensation Fund		Local hunters have reported disturbances to traditional hunting areas and practices as a result of shipping operations		
Marine Environment	Introduction of Aquatic Invasive Species	As listed in the Shipping and Marine Wildlife Management Plan (2016): 1. Ensure salinity of ballast water is within standards	<ul style="list-style-type: none">Salinity Testing of Ballast WaterAquatic Invasive Species Monitoring	All vessels have demonstrated compliance with ballast water exchange via salinity testing of ballast water tanks No Aquatic Invasive Species have been identified through Project monitoring Positive feedback for expanding Aquatic Invasive monitoring to include Ragged Island Community members have reported a concern that Aquatic Invasive are being introduced to the Project area as a result of shipping operations	<ol style="list-style-type: none">Increased Quality Control and Quality Assurance procedures for salinity testingUse of Remote Operative Vehicle system for underwater video surveys and specimen collection for assessing ship hull fouling	Response to final written submissions on the Mary River Modification Application – Production Increase, Fuel Storage, and Milne Port Accommodations (Baffinland 2018a) Response to QIA Comment No. 2 - Baffinland Responses to Reviewer Comments on 2017 NIRB Report (Baffinland, 2018d) Response to QIA Comment Number 37 Response to QIA Attachment 2 Comment 5
Dust	Vegetation Abundance and Diversity	As listed in the Terrestrial Environment Monitoring and Management Plan (2018): <ol style="list-style-type: none">Project activities will be planned and conducted to minimize the Project footprintWhere and when appropriate, dust suppressants may be used on the roads, particularly on heavy-use sections during snow-free monthsInstall shrouds on crushers	<ul style="list-style-type: none">Dust Fall Deposition Monitoring ProgramVegetation Abundance MonitoringVegetation and Soil Base Metals Monitoring	Dust fall deposition is greater (higher volume) than levels predicted in the Final Environmental Impact Statement Higher level of dust fall is not affecting vegetation health and level of metals detected in soil and vegetation are not exceeding regulatory guidelines Vegetation abundance and diversity is consistent with baseline levels Ongoing concern from community members about visual effects of dust fall and geographic extent of deposition Ongoing concern from community members about potential for uptake of metals by mammals harvested by hunters and bioaccumulation	<ol style="list-style-type: none">Six (6) additional dust fall samplers will be installed in late summer/fall of 2018Dust fall monitors will be placed at the 1 km distance, in three paired locations (east/west of the road)<ul style="list-style-type: none">one pair will be located near km 25one pair around km 56one pair around km 75–80Continue increased calcium chloride and water dust suppressionProcured 50 additional covers for crushers	Response to final written submissions on the Mary River Modification Application – Production Increase, Fuel Storage, and Milne Port Accommodations (Baffinland 2018a) Response to ECCC Comment No. 2 Response to QIA Comment No. 6 BIM / QIA Resolutions and Commitments (Baffinland 2018c) Response to Concern No. 11 Response to Concern No. 12 Response to Concern No. 13
	Vegetation Health (Metals Accumulation)					

References:

Baffinland 2018a. Mary River Modification Application – Production Increase, Fuel Storage and Milne Port Accommodations Modification Proposal (‘Production Increase Proposal’) (April 23, 2018) – Response to Comments. August 9 2018.

Baffinland 2018b. Nunavut Impact Review Board Process Guidance – Production Increase Proposal – Additional Information Requirement. June 20 2018. NIRB Public Registry ID: 318283

Baffinland 2018c. Baffinland/Qikiqtani Inuit Association Resolution and Commitments Excel Spreadsheet (180802-SR17-QIA-Baffinland2018IssueResolution-ENG). Agreed Upon August 2, 2018 as referenced in QIA’s August 3rd letter to NIRB.

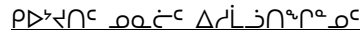
Baffinland 2018d. Baffinland Response to Reviewer Comments on the 2017 NIRB Annual Report. July 12, 2018.



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ANNEX D:
PROPOSED REVISIONS TO NIRB PROJECT CERTIFICATE, CONDITION 179

Term and Condition No.	179 (a)
Category:	Operational Variability/Flexibility
Responsible Parties:	The Proponent
Project Phase:	Operations
Objective:	To ensure that there are appropriate limits on the Early Revenue Phase Proposal marine shipping component in order to limit and manage likely project effects, while balancing the need for operational flexibility.
Term or Condition:	In any given calendar year, the total volume of ore shipped via Milne Inlet, shall not exceed 4.2 6.0 million tonnes.
Reporting Requirements:	For each year after the Proponent commences shipping ore via Milne Inlet under the Early Revenue Phase Proposal, the Proponent shall include in the Annual Report to the NIRB, a summary of the total amount of ore shipped via Milne Inlet for the previous calendar year.
Term and Condition No.	179 (b)
Category:	Operational Variability/Flexibility
Responsible Parties:	The Proponent
Project Phase:	Operations
Objective:	To ensure that there are appropriate limits on the Early Revenue Phase Proposal project land transportation component in order to limit and manage likely project effects, while balancing the need for operational flexibility.
Term or Condition:	In any given calendar year, the total volume of ore transported by truck on the Milne Inlet Tote Road shall not exceed 4.2 6.0 million tonnes.
Reporting Requirements:	For each year after the Proponent commences transportation of ore via the Tote Road under the Early Revenue Phase Proposal, the Proponent shall include in the Annual Report to the NIRB, a summary of the total amount of ore shipped via the Tote Road for the previous calendar year.
Term and Condition No.	179 (c)
Category:	Operational Variability/Flexibility
Responsible Parties:	The Proponent
Project Phase:	Operations
Objective:	To ensure that commitments made by the proponent with respect to the 2018 Production Increase and delivery of benefits to Inuit are adhered to, and, can be demonstrated through a body of evidence.
Term or Condition:	In the calendar year 2019 and 2020, the proponent shall be required to resource and support a third party to conduct performance audits of commitments made by the proponent to affected communities and Inuit of the Qikiqtaaluk region in relation to both the IIBA and the revised terms and conditions of the Project Certificate as of the 2018 Production Increase. Audits shall be overseen and directed by the Executive Committee of the IIBA.
Reporting Requirements:	On a bi-annual basis, the proponent shall file a Performance Audit Report" with NIRB. This report shall include the findings of the third-party auditor, and, Baffinland's commitment to addressing the findings the auditor.

ATTACHMENT 5

North Baffin Hamlet Letters of Support for PIP Extension Request

November 22, 2019

Mr. Brian Penney
President & CEO
Baffinland Iron Mines

Mr. Penney,

The Mayors from Pond Inlet, Arctic Bay, Hall Beach and Igloolik have met collectively in Rankin Inlet while attending the NAM AGM.

Baffinland production increase is due to expires on December 31, 2019. Also noted that a delay in the process of Phase 2 is reality. This delay should be an opportunity to work with the communities and answer concerns raised by them.

Knowing that communities have 470 members employed at the site as of October 2019, and communities have invested in increasing employment with Baffinland for our community members.

To not undermine any of our community members while meaningful consultation is performed in our communities by our communities, we encourage and support an extension to the production increase certificate to remain at 6M tons until decision in regard to phase 2.

We also want Baffinland to know that this extension supported by the communities is only if no more layoffs to members of our communities occur, and members who have been laid off are re-instated and accommodated with in the current project.

Mr. Penny, our communities, have agreed and plan to come together moving forward, despite the vast distance between our communities, our communities are very connected. Furthermore, we plan to meet, work and move forward together collectively. We encourage Baffinland to work with us with issues and concerns our communities have raised during the consideration of phase 2.

Sincerely:

Mayor of Hall Beach

Mayor of Pond Inlet



Mayor of Arctic Bay

Mayor of Igloolik

Mayor of Clyde River

CC: Megan Lord-Hoyle, Baffinland
Aluki Kotierk, Nunavut Tunngavik Inc.
PJ Akeeagok, Qikiqtani Inuit Association
Steve Pinksen, Government of Nunavut
David Rochette, Indigenous and Northern Affairs Canada

November 22, 2019

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President & CEO
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Sincerely:

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Mayor of Pond Inlet

Mayor of Arctic Bay

Mayor of Igloolik

for Mose Palituy
Mayor of Clyde River

CC: Megan Lord-Hoyle, Baffinland
Aluki Kotierk, Nunavut Tunngavik Inc.
PJ Akeeagok, Qikiqtani Inuit Association
Steve Pinksen, Government of Nunavut
David Rochette, Indigenous and Northern Affairs Canada

November 22, 2019

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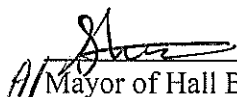
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Sincerely:



Mayor of Hall Beach

Mayor of Pond Inlet

Mayor of Arctic Bay

Mayor of Igloolik

Mayor of Clyde River

CC: Megan Lord-Hoyle, Baffinland
Aluki Kotierk, Nunavut Tunngavik Inc.
PJ Akeeagok, Qikiqtani Inuit Association
Steve Pinksen, Government of Nunavut
David Rochette, Indigenous and Northern Affairs Canada

November 22, 2019

Mr. Brian Penney
President & CEO
Baffinland Iron Mines

Mr. Penney,

The Mayors from Pond Inlet, Arctic Bay, Hall Beach and Igloolik have met collectively in Rankin Inlet while attending the NAM AGM.

Baffinland production increase is due to expires on December 31, 2019. Also noted that a delay in the process of Phase 2 is reality. This delay should be an opportunity to work with the communities and answer concerns raised by them.

Knowing that communities have 470 members employed at the site as of October 2019, and communities have invested in increasing employment with Baffinland for our community members.

To not undermine any of our community members while meaningful consultation is performed in our communities by our communities, we encourage and support an extension to the production increase certificate to remain at 6M tons until decision in regard to phase 2.

We also want Baffinland to know that this extension supported by the communities is only if no more layoffs to members of our communities occur, and members who have been laid off are reinstated and accommodated with in the current project.

Mr. Penny, our communities, have agreed and plan to come together moving forward, despite the vast distance between our communities, our communities are very connected. Furthermore, we plan to meet, work and move forward together collectively. We encourage Baffinland to work with us with issues and concerns our communities have raised during the consideration of phase 2.

Sincerely:

Mayor of Hall Beach

Mayor of Pond Inlet

Mayor of Arctic Bay



Mayor of Igloolik

Mayor of Clyde River

CC: Megan Lord-Hoyle, Baffinland
Aluki Kotierk, Nunavut Tunngavik Inc.
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ATTACHMENT 6

QIA Follow up Submission to NIRB Regarding Baffinland Production
Increase Application



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Serving the
communities of

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Cape Dorset

Grise Fjord

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Igloolik

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Kimmirut

Pangnirtung

Pond Inlet

Qikiqtarjuaq

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Resolute Bay

Sanikiluaq

On July 26, 2018, QIA committed to provide NIRB with a summary of the Project Stabilization and related commitments made by Baffinland. QIA, believes this letter fulfills this commitment, and should supplement QIA's July filing.

QIA and Baffinland have agreed, as part of the Project Stabilization approach, to manage outstanding concerns through a Commitment List. In total, there are 33 concerns across eight topics, which include the following:

- | | | | |
|------|------------------------------|-------|-----------------------|
| i. | Marine Shipping | v. | Inuit Owned Lease |
| ii. | Dust | vi. | Roads Management Plan |
| iii. | Management Plans | vii. | IIBA Implementation |
| iv. | Water Compensation Agreement | viii. | IIBA Renegotiation |

As of August 2, 2018, QIA and Baffinland have agreed upon the commitments of both Parties for all 33 concerns. Each of these commitments is being actively managed. QIA considers each item as being active and requiring additional attention to complete. At this point in time QIA has no reason to believe Baffinland will not meet its commitments as described in detail in our July 26, 2018 letter. To ensure that the commitments made by Baffinland are executed upon Baffinland has agreed to resource a third-party who will conduct Performance Audits to confirm Baffinland is making the necessary efforts to address the concerns. These Audits will assess the commitments made before NIRB under the 2018 Production Increase Application, and, the 2018 and 2019 IIBA Work Plans.

Given the regulatory review process established by NIRB and the Project Stabilization efforts of QIA and Baffinland, including Performance Audits, QIA is hopeful that the Production Increase will result in a better managed project and the proliferation in the opportunities and benefits Inuit receive. The next important milestone in the Project Stabilization is scheduled for early October 2018. QIA can commit to providing an update to NIRB on these activities at that time.

Sincerely,

Jeremiah Groves,
Acting Executive Director
Qikiqtani Inuit Association

CC Mr. Jaykolassie Killiktee, MHTO Chair
Mr. Joshua Katsak, Mayor of Pond Inlet
Mr. David Curley, QIA Board Member (Pond Inlet)
Mr. Levi Barnabas, QIA Board Member (Mary River IIBA Co-Chair)