



NIRB File No. 08MN053  
NWB File No. 2AM-MRY1325  
CIRNAC File No.: N2008T0014  
QIA File No.: LUA-2008-008  
DFO File No.: 2008 MR

February 13, 2020

Solomon Amuno, Technical Advisor II  
Nunavut Impact Review Board  
29 Mitik Street  
PO Box 1360  
Cambridge Bay, NU X0B 0C0

Dear Mr. Amuno:

**Re: Opportunity to address comments received regarding Baffinland Iron Mines Corporation's "Extension Request to the Production Increase" project proposal**

Thank you for your letter of February 4, 2020 providing Baffinland Iron Mines Corporation (Baffinland) with an opportunity to respond to comments that the Nunavut Impact Review Board (NIRB) received from interested parties on February 3, 2020 related to Baffinland's Extension Request to the Production Increase Proposal (Extension Request). Per your letter, comments were received from the following parties:

- Qikiqtani Inuit Association
- Mittimatalik Hunters and Trappers Association
- Government of Nunavut
- Government of Canada:
  - Crown-Indigenous Relations and Northern Affairs Canada
  - Environment and Climate Change Canada
  - Fisheries and Oceans Canada
  - Health Canada
  - Parks Canada
- Oceans North
- World Wildlife Fund

The enclosed package provides Baffinland's detailed responses to the comments received, including further detail on the relevant mitigation and environmental monitoring plans proposed within Baffinland's January 6 2020 Extension Request.

Baffinland wishes to again express its gratitude to the Hamlets of Arctic Bay, Clyde River, Hall Beach, Igloolik, and Pond Inlet for their careful consideration of this Extension Request, for making the time to discuss with Baffinland and consider its merits, and for their ultimate support of the Extension Request.

While the hamlets did not provide further comments to NIRB on the Extension Request, it is important for the NIRB to consider the letters from the hamlets dated November 2019 provided to the NIRB as part of the Extension Request in their decision making process. Baffinland is dedicated to maintaining a positive working relationship with the communities and it is our hope that our efforts are continuing to build mutual understanding and trust. We believe in sharing information so that all communities can make the decisions that they believe is best for them, and we are always available to them.

Baffinland wishes to thank the QIA for working closely with us to improve our engagement efforts, their commitment for ongoing collaboration for forging a path forward for the Phase 2 Proposal, and for their statement of support for the Extension Request.

Baffinland notes that comments submitted by other parties on the Extension Request demonstrates a high degree of governmental support, with positive recommendations for the approval of the Extension Request being filed by the Government of Nunavut as well as most federal departments. Baffinland also notes that the Mittimatalik Hunters and Trappers Association did not oppose the extension of the 6 Mt proposal in a time limited sense. Where technical issues were raised, Baffinland considered these carefully and has presented a reasonable path forward to address them.

Baffinland wishes to close by emphasizing that a positive decision on the Extension Request is essential to the ongoing operation of the Mary River Mine while the Phase 2 Proposal remains under consideration by the NIRB. For transparency with all decision-makers and interested parties, Baffinland has communicated the significant risks of negative socioeconomic effects in the Qikiqtani Region, Nunavut and Canada if the Extension Request is not permitted to proceed.

Based on the stringent conditions that were already established under the Project Certificate in relation to the Production Increase Proposal, combined with the comprehensive technical information and analysis submitted for the Phase 2 proposal which demonstrates that production and transportation at 12 Mtpa will not have significant adverse effects, the monitoring data from 2018 and 2019 which provides evidence that the effects of the 6 Mtpa Project remain within the FEIS predictions for the ERP, and the additional mitigations that Baffinland has committed to apply during the 2020 Extension period (if approved), the NIRB can be confident that there will be no significant adverse environmental or socio-economic effects should the Extension Request proceed.

Thank you for your consideration of our request.

Sincerely,



Megan Lord-Hoyle  
Vice President, Sustainable Development  
Baffinland Iron Mines Corporation

Cc: Ryan Barry, Tara Arko, Cory Barker (NIRB)  
Jared Ottenhof (QIA)  
Lou Kamermans (Baffinland)