

June 8, 2020

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Serving the communities of

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P[∞]U∆^c Cape Dorset

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PLTPC Kimmirut

Pond Inlet

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Sanikiluag

Tara Arko
Director, Technical Services
Nunavut Impact Review Board
Cambridge Bay, NU
XOB 0C0

RE: Response to Request for Comments on Draft Project Certificate No. 005, Amendment 3 - Baffinland Iron Mines Corporation's "Extension Request to the Production Increase Proposal"

Dear Tara,

The Qikiqtani Inuit Association (QIA) provides this letter in response to the Nunavut Impact Review Board's (NIRB) request for comment on the Draft Project Certificate No. 005 Amendment for Baffinland Iron Mines Corporation's (BIMC) "Extension Request to the Production Increase Proposal". The QIA appreciates the opportunity provided by the NIRB to provide comments on the draft Project Certificate and provides the following comments for your consideration.

Term and Condition 179(c)

QIA notes that the current draft Project Certificate provided on May 25, 2020, to intervenors omits the inclusion of the term "bi-annual" in reference to the frequency of third party performance audits. For reference, the version of 179(c) provided in the May 19, 2020 letter from the Responsible Ministers is as follows (emphasis added):

"The Proponent shall be required to resource and support a third party to conduct **bi-annual** performance audits of commitments made by the proponent in relation to both the IIBA and every proponent commitment and every term or condition of the Project Certificate relating to environmental management of the tote road component or environmental management related to shipping. The Proponent shall file Performance Audit Reports with the NIRB on or before March 31 and September 30 of each calendar year."

Term and Condition 183

The Responsible Ministers have altered Term and Condition 183 to require BIMC to provide an updated tracking table to the Department of Fisheries and Ocean's (DFO) bi-annually. This table must include "...(i) collective recommendations of the other members of the working group...". QIA requests that, to facilitate transparency and collaboration, the DFO and Baffinland distribute this table to all members of the working group.

QIA will raise this request at the next meeting of the Marine Environment Working Group.

Sincerely,

Jared Ottenhof

Director, Lands and Resource Management