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Karen Costello  
Executive Director  
Nunavut Impact Review Board (NIRB)  
29 Mitik Street, PO Box 1360  
Cambridge Bay, NU X0B 0C0

July 7, 2020

*Delivered via email to KCostello@nirb.ca*

**QIA Update Regarding Ongoing Resolution of Technical Issues in Preparation for Resumed Hearings for Baffinland Iron Mines Corporation's Phase 2 Proposal**

Ms. Costello,

The Qikiqtani Inuit Association (QIA) is writing to provide an update to the Nunavut Impact Review Board (NIRB) about progress toward resolving outstanding technical issues on Baffinland Iron Mine Corporation's (Baffinland) Mary River Project Phase 2 Proposal (the Project).

When NIRB wrote to all parties on April 24, 2020 to reschedule the April and May Technical Meetings for the Project due to COVID-19 pandemic challenges, NIRB requested that parties continue to work toward technical issues resolution in the interim, stating:

*The Board continues to encourage all parties to use this pause in the NIRB's process to continue working together to the extent practicable to further the technical review aspects of the Board's assessment of the Phase 2 Development Proposal. The Board reminds Baffinland and all parties of the importance of documenting the outcomes of any discussions on technical issues that may be held outside the Board's formal processes and communicating them back to the NIRB to ensure the public record is complete.*

QIA is pleased to advise that QIA and Baffinland have worked diligently to address unresolved concerns. This dialogue resulted in resolution of 48 of 53 of QIA's technical issues. QIA is therefore providing this update to NIRB to document the outcome of these discussions. A summary of key resolved issues is included below, and an updated list showing the current status of technical issues is appended to this letter.

While some technical issues remain unresolved, the matters which are resolved address some of the most critical concerns raised by QIA regarding the impacts of the Project. Throughout the NIRB reconsideration process, QIA continually stressed the importance of the following matters on which significant technical progress has now been achieved:

- Proper integration of Inuit Qaujimagatuqangit (IQ) into the Project;
- Robust Inuit participation in environmental decision-making and Project monitoring;
- Joint Baffinland-Inuit Adaptive Management Planning; and
- Agreement on significance determinations and the process for Culture, Resources, and Land Use assessment.
- A revised benefit system which prioritizes Community Direct Benefits



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QIA and Baffinland will create an Adaptive Management working group to oversee development of a jointly-approved Adaptive Management Plan. Thresholds and triggers in the AMP will be based on Inuit, regulatory and Baffinland objectives and requirements, Project monitoring data collected by both QIA under the Inuit Stewardship Plan, and Baffinland. This jointly-developed AMP will allow Inuit to participate in the development and approval of objectives, indicators, thresholds, and response requirements for all environmental sub-plans included in the Adaptive Management Plan. This



The CRLU Monitoring Program will not replace existing monitoring plans or requirements mandated by NIRB or other regulatory bodies, but rather to complement them and provide an enhanced avenue for integration of Inuit community input and IQ into the collection of data related to the gauging of Project effects. The CRLU Monitoring Program adds protection and confidence for Inuit concerned about Project effects. The Program will provide a culturally appropriate process for facilitating Inuit



QIA maintains, however, that the Public Hearing must include hearing dates in the most-impacted community of Pond Inlet. QIA also maintains that there must be an in-person component in the remaining hearing schedule to ensure that community members have the opportunity to attend and share information and ask questions orally in accordance with Inuit tradition. Public participation which occurs only via teleconference or written submissions will, in QIA's view, undermine the ability of Pond Inlet community members to fully participate in the process in a meaningful way that accommodates cultural needs.



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Qikiqtani Inuit Association

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As the NIRB Impact Assessment resumes, or as directed by NIRB, QIA will develop and submit an updated QIA Final Written Submission. This update from QIA will provide additional detail about how QIA and Baffinland propose to address the previously-unresolved technical issues.

Should you have any questions relating to the above, please do not hesitate to contact me directly.

Sincerely,

Jared Ottenhof  
Director  
Qikiqtani Nunaliirijikkut

**SCHEDULE B**  
**Summary of Resolution of QIA Issues Raised in**  
**NIRB Phase 2 Project Proposal Reconsideration Process**

<b>QIA NIRB Technical Comment Tracking Number</b>	<b>Resolution Status as of Signing of ICA</b>	<b>Reference to Schedule/ ICA Terms Which Resolves QIA NIRB Technical Comment (where applicable)</b>
1	Resolved, Contingent on ICA Implementation	2
2	Resolved, Contingent on ICA Implementation	1, 2, 4
3	Resolved, Contingent on ICA Implementation	1, 2, 4, 6
4	Resolved, Contingent on ICA Implementation	1, 2, 4
5	Resolved, Contingent on ICA Implementation	1, 2, 4, 6
6	Resolved, Contingent on ICA Implementation	2, 8
7	Resolved	1, 2, 3, 4
8	Resolved, Contingent on ICA Implementation	1, 3, 4, 5, 7
9	Resolved, Contingent on ICA Implementation	1, 3, 4
10	Resolved	1, 2, 3, 4, 6
11	Resolved	1, 3, 4, 6
12	Resolved Prior to ICA	N/A
13	Resolved	1, 2, 4, 6
14	Resolved	1, 2, 4, 6
15	Resolved	1, 2, 4, 6
16	Resolved	1, 2, 4, 6
17	Resolved Prior to ICA	N/A
18	Resolved Prior to ICA	N/A
19	Resolved Prior to ICA	N/A
20	Resolved	8, 17
21	Resolved	17
22	Resolved	9B
23	Resolved Prior to ICA	N/A
24	Resolved Prior to ICA	N/A
25	Resolved Prior to ICA	N/A
26	Resolved Prior to ICA	N/A
27	Resolved Prior to ICA	N/A
28	Resolved Prior to ICA	N/A
29	Resolved Prior to ICA	N/A
30	Resolved	2, 9B
31	Resolved Prior to ICA	N/A
32	Resolved Prior to ICA	N/A
33	Resolved Prior to ICA	N/A
34	Resolved Prior to ICA	N/A
35	Resolved Prior to ICA	N/A
36	Resolved Prior to ICA	N/A
37	Resolved Prior to ICA	N/A
38	Resolved	1, 2, 3, 7



<b>39</b>	<b>Resolved Prior to ICA</b>	<b>N/A</b>
<b>40</b>	<b>Resolved Prior to ICA</b>	<b>N/A</b>
<b>41</b>	<b>Outstanding</b>	<b>N/A</b>
<b>42</b>	<b>Outstanding</b>	<b>N/A</b>
<b>43</b>	<b>Outstanding</b>	<b>N/A</b>
<b>44</b>	<b>Outstanding</b>	<b>N/A</b>
<b>45</b>	<b>Partially Resolved</b>	<b>N/A</b>
<b>46</b>	<b>Resolved</b>	<b>1, 2, 4</b>
<b>47</b>	<b>Resolved</b>	<b>N/A</b>
<b>48</b>	<b>Partially Resolved</b>	<b>N/A</b>
<b>49</b>	<b>Resolved</b>	<b>1, 2, 4</b>
<b>50</b>	<b>Resolved</b>	<b>N/A</b>
<b>51</b>	<b>Outstanding</b>	<b>N/A</b>
<b>52</b>	<b>Resolved Prior to ICA</b>	<b>N/A</b>
<b>53</b>	<b>Resolved, Contingent on ICA Implementation</b>	<b>9B</b>