



WWF-Canada
410 Adelaide St. West
Suite 400
Toronto, Ontario
Canada M5V 1S8

Tel: (416) 489-8800
Toll-free: 1-800-26-PANDA
(1-800-267-2632)
Fax: (416) 489-3611
ca-panda@wwfcanada.org
wwf.ca

August 11, 2020

Nunavut Impact Review Board

Dear Ms. Costello,

Re: Invitation to parties to comment on motion from Baffinland Iron Mines Corp. received on August 4, 2020

In response to the request for comment on Baffinland's Notice of Motion regarding the rescheduling of the Mary River Project Phase 2 public hearing, WWF is raising the following issues for the Board's consideration.

Rescheduling the public hearing as proposed by Baffinland is a serious decision which requires careful consideration by the Board as well as by intervenors, and it is impossible for intervenors to provide a detailed response to the motion within the very limited timelines provided by the Board at Baffinland's request. We ask that you also consider the unresolved issues raised in past WWF submissions and in our recent correspondence. The technical meeting and community roundtable will be essential to address the outstanding issues raised by WWF and other intervenors in a public forum. The proposed timing of the hearing does not allow enough time for a fulsome technical meeting, community roundtable, and subsequent regrouping and preparation leading up to a full hearing within the same month.

We have heard repeatedly from mayors and Hunters and Trappers Organizations in affected communities that the process has been resumed too quickly. In light of this, there is no way that scheduling a full hearing for October 30th is appropriate. A lack of preparation led to the failure of the most recent meetings held in November 2019, and considering the burden on all participants associated with preparing for and attending each meeting, the hearing should not resume until Hunters and Trappers Organizations and hamlets are ready to participate fully to avoid wasting time, effort, and money on everyone's part. WWF echoes the concerns raised by affected communities as described in their August 6th letter to NIRB and other correspondence. The communities outline several areas of ongoing concern regarding environmental and cultural impacts, which cannot be considered resolved without consideration of evidence in a technical meeting. The communities also state that they will require more time to consider the issues Baffinland and QIA consider resolved, further indicating that it is premature to schedule a hearing at this time.

We also cannot ignore that this process is now taking place in the context of an unprecedented global pandemic. Taking advantage of the challenges posed by COVID-19 to fast-track an approval despite the clear concerns from communities about this project is unacceptable. All of us on this planet are dealing with the effects of COVID-19 and it should not be used by Baffinland to ignore the most affected communities' concerns or calls to slow down the process.

Sincerely,

Paul Okalik
Lead Specialist, Arctic