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The MHTO requests that Baffinland consider compiling information in a manner that provides a comprehensive discussion and which integrates monitoring results across programs for various components of interest.

2. Insufficient incorporation of IQ and input from Inuit to ongoing mitigation and monitoring

The MHTO notes with concern, that the report lacks comprehensive integration of monitoring results, reporting, and findings from monitoring programs and data collection. Specific reporting on single conditions provides references to various reports, but this does not provide an adequate overview of the monitoring program related to say, narwhal, or dust, or the freshwater environment.

Baffinland has not incorporated IQ adequately into its ongoing monitoring of the project effects, nor has it incorporated input from Inuit to inform its monitoring or mitigation measures in an acceptable manner.

The MHTO has been voicing its concerns with marine wildlife and impacts from Project activities for many years, through many formats and venues. The sentiment of the community members knowledgeable about the Project is that Baffinland has not considered our determination of what is a significant impact for Inuit, into its decisions around what level of impact the Project has been having, or is predicted to have. It is our perspective that if an impact is significant for Inuit, then the impact of the Project is significant. While the 2019 Annual Report makes many references to information heard during consultations and meetings, we note no significant changes to Baffinland's monitoring or mitigation programs in the 2019 report refer to having been influenced by IQ or local knowledge. We request that in future Annual Reporting, Baffinland make specific reference to particular aspects of the Project monitoring and mitigation which reflect what it has learned from local knowledge and IQ.

Last year, QIA commented that community observations from 2018 provide better evidence for Potential project-related impacts than any of BIMC's monitoring activities (e.g., tagging, vessel-based Bruce Head study, Shipboard Observers) from that year. Local knowledge and observations need to be included in monitoring programs in an objective and transparent manner.

Baffinland's response included a lot of information about how it seeks to "gather 'IQ' through frequent and ongoing community engagement, where community members have the opportunity to share their unique knowledge and values in relation to the Project." It also suggested that through community engagement, residents have often used their knowledge to share observations about the land, wildlife, and their communities, and that there have been opportunities for residents to describe concerns related to Inuit livelihood effects; and suggest ways that these issues might be addressed. Baffinland indicated that it uses this information to supplement the overall understanding of the Project, its

potential effects on the environment and nearby communities, and how best to manage any potential adverse effects through specific monitoring and mitigation initiatives. We request that Baffinland provide a more systemic overview of information it collects, and as above, how and where this is integrated in a meaningful way, into project operations, mitigation and/or monitoring.

The lack of clarity around how and where Baffinland has incorporated local knowledge is concerning for the MHTO, as Baffinland's Annual Report routinely states that all impacts are within FEIS predictions. Given that conclusion, we suggest that Baffinland has not given appropriate consideration to community input and how best this may supplement its understanding of the Project, nor the effects of the Project on the environment and our community, as felt and defined by Inuit.

If Baffinland had considered community knowledge and IQ and was integrating what it has heard and learned from our community, why has it not begun a more comprehensive seal monitoring program? Why has it not investigated impacts of shipping on seals? Why does it continue to conduct ice breaking shipping, despite our concerns and opposition, and repeatedly say there is no significant impact on narwhals and seals from its project? This is not in line with what Inuit know, or with the community knowledge and IQ that we have.

We submit that having MHTO members attend one or two Marine and Terrestrial Environment Working Group (MEWG and TEWG) Meetings each year does not constitute the collection or incorporation of IQ and should not be referenced as such. These meetings are highly technical in nature, and often materials are not provided for review until or just before the meeting dates. The Working Group Meetings are used by Baffinland to provide information to parties, where its staff and consultants often spend hours giving presentations. The expectation is that parties will provide written comment on monitoring program documents (plans and/or results), however the MHTO has not submitted comment on any document at the MEWG or TEWG to date. Soliciting feedback from the one or two members in attendance, on presentations delivered that day, is not an adequate tool for collection of IQ or local knowledge.

Additionally, the MEWG and TEWG are not set up with a focus to collect IQ, and the MHTO's participation at these meetings must not be incorrectly and unfairly interpreted as a means for the Proponent's collection of IQ, or gathering local knowledge on specific topics. The MHTO's participation at MEWG and TEWG meetings is very different from that of other member and observer organizations. The MHTO has not had the capacity to review or analyze any of the reporting or other materials that are presented by Baffinland during these meetings, we are not funded properly to provide oversight to all of the materials required for the Project as a whole. Citing comment and concern from MHTO during MEWG and TEWG meetings is not representative of information that should or could be collected as "community observations" and used to inform decisions related to project management and operations.

Further, Baffinland's hiring Inuit - as shipping monitors, or to carry out work on its monitoring programs, while a very important, valuable part of the local economy that provides excellent opportunities for residents in terms of skills development and meaningful employment, this does not constitute the collection or incorporation of IQ into Baffinland's programs.

Staff hired by Baffinland may be Inuit that are very experienced and knowledgeable in matters relating to the environment and resources, however unless the terms of their employment are to contribute IQ and local knowledge, we would suggest Baffinland acknowledge this distinct difference.

We also submit that providing a listing of meetings held with the MHTO does not necessarily constitute collection of IQ or local knowledge, and furthermore, there is no evidence provided of what that information was, nor whether or how Baffinland incorporated this input to its programs.

We request that going forward, for any meetings or discussions being logged as contributing to the collection of IQ or incorporation of IQ and community input into its programs, Baffinland keep minutes of all discussions with the MHTO or its members, and that these be submitted to the MHTO for confirmation, and to the NIRB as a part of future annual reporting.

We request Baffinland be required to develop a separate and distinct IQ collection and monitoring program, whereby it is continually checking in with not only the MHTO, but the community at large, to identify and incorporate Inuit knowledge and IQ to its programs. Holding community meetings, “kitchen table” discussions, targeted interviews, and collaborative mapping sessions are some suggestions of ways Baffinland may approach the development of its local knowledge base. From that systematic approach, we would suggest a record of information be compiled and that from there, Baffinland can point to when and how IQ and local knowledge have been incorporated into the ongoing works of the Project.

In its 2019 Annual Monitoring Report, Baffinland suggests that it, “with support from the QIA and other members of the TEWG, has put a strong emphasis on continuing existing community-based monitoring, as well as developing more diverse community-based monitoring initiatives.” We are unclear whether Baffinland is aware of the community based monitoring initiatives that are taking place in Pond Inlet. We are interested in learning how projects that are separate from the funding Baffinland provided to the MHTO for community based monitoring have been considered by Baffinland in its ongoing mitigation and monitoring work. Given that comprehensive community based monitoring programs - separate from the MHTO - have been ongoing in Pond Inlet for the past number of years, with both marine and terrestrial focuses, the MHTO was concerned neither of these programs has been referenced in this current Annual Report, nor from our quick review, in any past.

The MHTO requests that Baffinland provide details around the existing community-based monitoring programs or initiatives it has emphasized, and how it has “put a strong emphasis” on it, and also that it confirm the “more diverse community-based monitoring initiatives” it has emphasized the development of, and how it has done so. Specific references and dates of meetings held, people involved, and programs discussed are requested.

3. Inadequate caribou monitoring

The MHTO is concerned Baffinland has not engaged in its own caribou monitoring at a level that could inform on project-related impacts, or, where possible, incorporated other regional data that may assist in this determination. For example, Baffinland has indicated its height of land surveys for caribou have not seen any caribou at all, and that the intent of the HOL survey is to not detect all caribou – rather have a focused effort near the calving season to determine if there may be caribou calving near project activities. Baffinland has suggested the HOL survey effectively surveys areas near project activities. From the 2019 Annual Report, habitat loss and restriction of movement are listed as valued ecosystem components. The effects considered are direct habitat loss due to the Project footprint, and indirect habitat loss due to sensory disturbances, as well as project infrastructure and the tote road acting as a barrier to the movement of caribou. For both of these effects, Baffinland lists its height of land monitoring; snow track and snow bank monitoring; and incidental observations as methods to evaluate impacts as being “within FEIS predictions.” We note with concern that no Inuit or local knowledge is incorporated into these impact evaluations, nor to data collection or analysis efforts.

The MHTO is concerned that if the information Baffinland uses to inform its understanding of project impacts is limited to results from its weak monitoring programs and incidental observations, we will not see any useful information from project-related monitoring and impact evaluation. If Baffinland is reliant upon data from the Government of Nunavut’s regional surveying efforts to inform on Project level impacts, we request the GN confirm that approach is adequate for detecting those impacts. It is our understanding the last GN survey of Baffin Island caribou took place in or around 2014.

The MHTO suggests Baffinland increase its effort, and develop and undertake a/an additional method(s) of monitoring to detect the presence of caribou and that it expand its survey area if caribou have not been detected at its few height of land stations over the past six years of effort. The presence of caribou is important to Inuit, and should be of high importance to the Project as well. Knowing where caribou are in relation to the Project is important, and where Baffinland’s studies are not finding caribou to analyze whether activities are having an impact, we suggest they must look harder. **The MHTO requests that the NIRB require Baffinland to make immediate improvements to its terrestrial monitoring programs for the collection of caribou-specific data. The MHTO also requests that the NIRB require Baffinland to meet with us to discuss how it plans to update its monitoring, and further request that the Government of Nunavut make its regional biologist (or another equally qualified individual) and members of its staff responsible for designing its surveys, available for these discussions.**

4. Dust monitoring program and Inuit concerns

While Baffinland's 2019 Annual Report acknowledges that it has recorded "several years of exceedances of the predicted threshold levels for dustfall presented in the FEIS", and that it plans to reinstate vegetation and soils sampling programs, as well as utilizing a new dust suppressant, Baffinland has not indicated if or how it will improve its dust monitoring program and introduce additional mitigation measures. MHTO members have been impacted by dust many miles away from the mine site, in both terrestrial and marine settings. The MHTO has not seen where Baffinland has integrated Inuit reports and experiences of significant amounts of dust on snow and ice, into its ongoing monitoring and mitigation strategies. MHTO recommends Baffinland be required to consult with air quality experts at ECCC and with the MHTO to revise its monitoring and mitigation strategies to address the MHTO concerns around dust dispersion outside of the local project area, given the impacts to Inuit travelling many miles from the Project but being impacted by ore dust.

The MHTO is also concerned that Table 4.6 Air Quality Impact Evaluation does not provide adequate impact evaluation for the components listed. For example, where the table lists "Earthworks, mining, hauling, stockpiling and transfer of ore", in the Impact Evaluation column, the Report states "Monitoring showed that although dustfall exceeded FEIS predictions at select locations, in general total annual dustfall across the Project area decreased in 2019." It is the same statement for "Haulage of ore and other traffic on the Tote Road", i.e. that "Monitoring showed that although dustfall exceeded FEIS predictions at select locations, exceedances decreased in 2019 as compared to 2018."

This is telling us that for the first component, total dustfall decreased in 2019, and that for the second component, the instances of dustfall exceedances were less in 2019 than the previous year. This provides no information about the impacts of exceedances. It is clear, stated in fact, that dustfall exceeded FEIS predictions for both activities. In columns for other components, it states "within FEIS predictions", however this table does not even acknowledge in plain statements, "exceeds FEIS predictions", it provides ancillary information about comparison to last years' results - which were **also** above FEIS predictions. This is not helpful, or useful.

Where is a discussion of the trends which may be resulting from Baffinland's reporting on "several years of exceedances"? Why has Baffinland put its vegetation and soils monitoring programs on hold until 2020? The MHTO finds this deeply concerning - first, that there is no discussion around trends, or an analysis of impact, and secondly, though no less serious, that Baffinland was allowed to suspend monitoring programs, on a component that has experienced exceedances against FEIS predictions for many years. What is the point of this monitoring program? **The MHTO requests the NIRB provide immediate direction to Baffinland, and that it undertake its own, or a third party analysis of data and results, and require Baffinland to work with ECCC and the MHTO on a path moving forward.** Given the importance of the dust issue to Mittimatalingmiut (as referenced in Baffinland's Annual Report), we do not support further suspensions or weakened changes to the monitoring and mitigation program without the NIRB engaging in full public commentary around this item.

5. Inadequate ballast water monitoring and sampling protocol

Baffinland's 2019 Annual report indicated it identified a potentially invasive species "Marenzelleria viridis" (a mudflat worm found normally in southern Canada and overseas) in Milne Port and that further analysis was required. Given that these results were from 2019, the MHTO requests that analysis be completed and provided to our office immediately, along with an adaptive strategy which incorporates biota screening/sampling of ballast water and better monitors ballast release in Milne Port.

The MHTO requests that Baffinland amend its monitoring program and sampling protocol to include "biota" in ballast water that may be introduced via releases in the RSA.

We note that in 2018, the QIA presented issues with Baffinland's Annual Reporting and Project Certificate Condition 87, noting specifically that the studies undertaken by Baffinland do not prevent species introduction, but only provide evidence that efforts at prevention have failed. The MHTO agrees with this concern, and notes that QIA recommended that the Proponent monitor species' presence and abundance in the ballast water tanks of incoming Project vessels to determine whether they have exchanged and/or treated the ballast water to remove potentially invasive species (compliance) and to learn the efficacy of those measures for removing non-indigenous species, particularly those that are potentially invasive.

Baffinland's response to the QIA's concern (and to the current MHTO comment) is unsatisfactory. It stated that biological monitoring of ballast water was not being considered for 2019, and that Baffinland's current ballast water sampling remains a voluntary measure that exceeds federal and international guidelines for ballast water management.

The MHTO submits that these measures, while voluntary, are still not enough to protect our hunting grounds from potential introduction of invasive species which have the potential to seriously disrupt the food chain on which we depend. Given the identification of *Marenzelleria viridis* in 2019, and the possibility of this being a Project-related introduction of an invasive species, the MHTO **requests that Baffinland be required to immediately develop a program and commence biological sampling of ballast water to protect our marine environment from its shipping activities.** There is no excuse to avoid taking cautionary measures that will protect the ecosystem of Milne Inlet and surrounding waters for our residents depend on the food from these waters.

6. Inadequate marine mammal monitoring

Baffinland's marine mammal monitoring programs are inadequate to measure impacts, especially considering its continued and inadequately assessed use of icebreakers to support shoulder season shipping. Baffinland has not undertaken adequate monitoring of locally important seal populations and how the Mary River project may be affecting these species, given their value to Inuit and the ecosystem, nor for narwhal in the area.

We would like to highlight QIA's comments to the 2018 Annual Report, specifically QIA 7 and 8, which noted that Baffinland had provided its approach to stakeholder engagement as a feedback loop, but it had not provided examples of how "Consideration of Feedback, Concerns and Local Knowledge" have been used to develop adaptive management. Where the objective is to "[f]ocus priorities so that potential adverse effects are mitigated and Project benefits are enhanced," QIA noted that local Inuit had reported impacts to ringed seals but little to no monitoring was being conducted, and that this appears contrary to the Proponent's stated objectives.

Baffinland's response indicated "Marine mammal aerial surveys are planned for July and August 2019. This will include surveying for all marine mammal species in the RSA, including ringed seal, bearded seal, bowhead whale, narwhal, beluga, walrus and polar bear. Monitoring for ringed seal will also be conducted during the 2019 Ship-Based Observer monitoring program off of the MSV Botnica."

The MHTO requests that Baffinland and DFO comment on whether aerial surveys are the most useful method for collecting information about seal abundance and distribution, and what else these types of surveys can tell us. We further request that Baffinland clarify its plan for the 2020 season and confirm what types of information it will learn from its monitoring planned for seal.

We also note that the Ship Based Observer Report submitted with the 2019 Annual Report provides relative abundance numbers for seals, based on observer counts from the vessel. We are not convinced that opportunistic sightings can be relied upon for abundance counts. Furthermore, the MHTO does not agree that documenting observations of seals during Ship-Based Observer and aerial surveys can be substituted for a comprehensive and systematic seal monitoring program in the Regional Study Area.

As is the case with narwhal, the presence of seals does not tell us whether or to what extent project shipping or other activities, or secondary impacts such as those to food chain dynamics, may have on the marine mammal populations that our subsistence harvest depends upon. It also does not address issues around body condition, overall health, demographic changes in population level, etc. It does not say anything about use of habitat, and without implementing proper systematic surveying techniques, we suggest it will not be possible to utilize the data in comparative analysis or identification of trends. These are the questions and issues we ask be considered in the context of the Mary River project activities and impacts to narwhal and seal. **We request that Baffinland be immediately required to develop and implement a comprehensive seal monitoring program, and that its narwhal monitoring program be revised to incorporate additional effects for consideration.**

7. Icebreaking

Ice Breaking has not been properly scoped into the NIRB's assessment to date, and the MHTO requests that the Proponent cease use of ice breakers immediately, and until such time as the NIRB has undertaken appropriate assessment of this activity.

Baffinland's 2019 Annual Report does not provide specific information around the use of icebreakers, the monitoring of impacts of this activity, except in terms of compliance to relevant Project Certificate conditions, referencing the use of its icebreaker to undertake the Ship Board Observer program, and the deployment of hydrophones to measure ship sounds and where possible, marine mammal vocalizations during early shoulder season shipping.

The MHTO submits that Baffinland's use of icebreaking vessels has not undergone adequate assessment by the NIRB, nor has this activity been subject to the rigour of impact assessment by agencies with expertise that should occur before such a major activity occurs on an ongoing basis, as has been the case since 2018.

We do not agree that Baffinland's use of icebreakers within the RSA can be permitted without the necessary assessment steps having occurred. During the Marine Environment Working Group teleconference held in June 2020, the MHTO raised this as a concern. Baffinland provided via email, a listing of references to various documents and meetings which purportedly would address this concern, and suggested it would not entertain further discussion of icebreaking during the subsequent MEWG call. Baffinland's references included the following:

- Section 5.3.4 of Baffinland's Extension Request Information Package (January 6 2020), details Project shipping mitigations associated with current operations, including those related to icebreaking activities.¹
- In its Final Written Submission (FWS) on the Extension Request to the Production Increase Proposal, DFO (FWS 3.2) recommended the NIRB include an additional Term and Condition limiting any ice breaking activities associated with the Project.
- In response to DFO FWS 3.2, Baffinland provided the following response: "Baffinland notes that shipping in support of the Production Increase Proposal is consistent with the nominal dates approved under the Early Revenue Phase (ERP). Subsequently, and as implemented in 2018 and 2019, Project vessels do not enter the RSA until landfast ice has broken up along the entire shipping corridor and it has been confirmed with the MHTO that hunters are no longer using the floe edge. The icebreaker contracted by Baffinland in 2018 and 2019 was used for the purpose of providing escort for safe navigation of Project vessels travelling through Eclipse Sounds and Milne Inlet at the beginning and end of the shipping season. While ice breaking does occur at intermittent points during a given transit in the shoulder seasons, it is not continuous along the entire route. Rather, ice concentrations are variable and the icebreakers interactions with ice are similarly variable. It is also noted that this is a limited activity that is only required at the beginning and end of the shipping season."
- The above exchange between DFO and Baffinland as part of the review process was summarized by the NIRB in its Reconsideration Report under Section 3.1.1.²

¹ This relates to the Production Increase Proposal, suggesting mitigations for icebreaking, not proposing the use of, or providing a description of icebreaking ships.

² Reconsideration Report for the Production Increase Proposal Extension

- Following receipt of Baffinland's response to DFO FWS 3.2, DFO issued correspondence to the NIRB dated February 24 2020 indicating that although DFO had initially recommended Baffinland not conduct icebreaking in its FWS on the PIP Extension Request, it had since revised its position on this recommendation. Specifically DFO indicated that Term and Condition 183 would provide a sufficient mechanism for ensuring the protection of marine mammals and the marine environment in light of Baffinland's need to conduct ice breaking activities at the start and end of the shipping seasons to successfully ship up to 6MTPA.
- The NIRB recommended the Extension Request be allowed to proceed. No terms and conditions related to restricting ice breaking activities were proposed by the Board or the Responsible Minister's as part of the approval and amended PC 005.
- It is also noted that icebreaking activities associated with the current phase of the Project were discussed in during Day 2 of the 2019 NIRB Marine Monitoring and Marine Mitigation Workshop held in Pond Inlet (see Section 2.6 and 3.0 of the NIRBs Workshop Summary Report). As outlined in the NIRBs Summary Report, several MEWG members, including DFO, PC and the MHTO, attended this workshop and should therefore be well briefed on the icebreaking activities associated with the Project described by Baffinland during the workshop.

The February 24, 2020 DFO correspondence referenced by Baffinland states:

"If the NIRB recommends approval of Baffinland's PIP Extension, DFO will continue to work with Baffinland and the MEWG to ensure protection of marine mammals and the marine environment. DFO acknowledges that Condition 183 may provide a sufficient mechanism to do so in the interim."

The MHTO requests that DFO confirm whether Term and Condition 183 provides a sufficient mechanism for ensuring the protection of marine mammals and the marine environment considering Baffinland's current ice breaking activities.

In its comment on Baffinland's 2018 Annual Report, QIA item 10 indicated:

“In 2018 the Proponent shipped iron ore between July 24 to October 17, using "an ice management vessel (the MSV Botnica) to escort ore carriers at the beginning and end of the shipping season, which served to facilitate safe passage through prevailing ice conditions QIA recommends that the Proponent and NIRB describe the extent of ice breaking that has been approved under its existing Project Certificate including the the ERP Addendum or Production Increase. QIA also request that the Proponent provide a detailed description of any 2019 plans for shipping when ice is present.”

Baffinland’s response stated:

“Operational shipping in 2018, including the use of the MSV Botnica to escort ore carriers at the beginning and end of the shipping season is consistent with shipping season activities described in the FEIS for the ERP, namely shipping between approximately July 15 to October 15...” *(emphasis added)*

We do not agree that the use of icebreakers to support ship movements from Eclipse Sound to Milne Port was included within the FEIS for the Early Revenue Phase, and request that Baffinland provide clear references to where the use of icebreakers has been included within the scope of either the ERP or Production Increase Proposal.

We submit that Baffinland’s identifying the shipping season dates (July 15 to October 15) per its response to QIA’s annual report comment above, does not suggest that the use of icebreakers has been included or is implicit within the project’s scope. We also submit that with the exception of the current consideration of Phase 2 activities, impact assessment, monitoring and specific mitigation around the use of icebreakers has not been included within the FEIS or FEIS Addendum documents filed with the NIRB. Annual Reporting documents are not a substitute for impact assessment which occurs prior to project approval.

We submit that neither the prior assessments undertaken, nor the current ongoing monitoring programs provide adequate information on baseline conditions or consider impacts to: sea ice (as habitat, and a VEC), seals, marine mammals, or Inuit use of the marine environment, and/or harvest of country food as each of these relate to the use of icebreakers in the Regional Study Area.

The MHTO is concerned that aside from limited comment on Baffinland’s annual reporting, and recent comment on the Production Increase Proposal earlier this year, we have not had fulsome discussions of this issue before the NIRB. We are deeply concerned that Baffinland was not more transparent in the scope of its activities with the NIRB, and that other intervenors have not commented on the use of ice breakers nor the glaring fact that this activity has not been properly assessed. It is our understanding that the use of icebreakers is currently undergoing assessment and being considered within the Phase 2 proposal before the NIRB. This activity has not been appropriately considered or allowed to proceed in the systematic way that is required for major industrial development projects in Nunavut.

The MHTO requests that if applicable, the NIRB provide an indication of where its Hearing Decision Reports or Project Certificates and Amendments specifically address the use of icebreakers within the Northern shipping route (Eclipse Sound - Pond Inlet - Milne Inlet). Additionally, if possible, the MHTO requests that the NIRB provide references to how ice breaking has been specifically included within the scope of its assessment for project effects associated with shipping via Milne Port.

The MHTO remains opposed to winter shipping, including the use of icebreakers during shoulder seasons. We have not participated in impact assessment in respect of this activity, and request a meaningful opportunity to do so, prior to further use of icebreakers within the Northern shipping route.

Conclusion

In conclusion, we note that Baffinland's responses may not address our issues to our satisfaction, and we would like to be clear on Baffinland's ability or willingness to make meaningful commitments or changes to monitoring programs to address concerns raised in respect of their ongoing operations.

As such, we respectfully ask that the NIRB consider providing an opportunity for parties to comment on the acceptability of Baffinland's responses to our comments on the Annual Report. This will ensure the NIRB is aware of outstanding concerns prior to its Board's review and provision of recommendations to the Proponent later in the year.

We appreciate this opportunity to provide comment on the 2019 Annual Report, and are especially thankful for the Board's patience in accepting this late submission, and Baffinland's efforts to respond, recognizing that our resources have been exceptionally stretched to participate in the ongoing Phase 2 assessment over the past month.

Please contact Molleen Anaviapik, MHTO Manager at pond@baffinhcto.ca with any questions or for clarification.

Sincerely,



Caleb Sangoya
Secretary Treasurer
Mittimatalik Hunters and Trappers Organization

cc: Lou Kamermans, Baffinland
Megan Lord-Hoyle, Baffinland