

From: Neida Gonzalez

Sent: Thursday, April 15, 2021 9:53 AM

To: Teresa Meadows

Cc: 'Eamon Murphy'; 'Chris Debicki'; 'Lorraine Land'; 'Brad Armstrong'; 'Gruda-Dolbec, Simon'; 'Emily Stockley'; 'Arthur Yuan'; 'Lloyd Lipsett'; 'Isabelle Gilles'; 'Tester, Frank J.'; 'Lori Idlout'; Paul Okalik'; 'Christine Kowbel'

Subject: RE: Exhibit: Updated Slide Decks BIMC

Dear Ms. Meadows:

Nunavut Tunngavik Incorporated (NTI) is responding to Baffinland Iron Mines Corporation (BIMC)'s request to admit two slide decks as exhibits on the public record. The two slide decks are described by BIMC as:

- i. supporting slides, previously shared information
- ii. supporting slides, new information

NTI has no objections to the admission of the first slide deck of previously shared information. With respect to the second slide deck, NTI objects to the admission of the slides within that slide deck that:

- provide new evidence at this late stage in the public hearing process (Slides 1-7); and
- refer to speculative economic benefits that have not been agreed to by the Qikiqtani Inuit Association (QIA) as the Designated Inuit Organization for negotiating benefits within an Inuit Impact and Benefit Agreement (Slides 4-7).

NTI is of the view that admitting new evidence at this late stage in the review process would be procedurally unfair as new evidence cannot be tested through oral or written questions by the interveners. In addition, NTI objects to BIMC providing evidence of potential new economic benefits that have not been confirmed through a negotiated IIBA with QIA. There is no certainty that the economic benefits presented by BIMC in these slides will be available to Inuit without these benefits being incorporated into an IIBA negotiated pursuant to Article 26 of the Nunavut Agreement.

Previously, the Nunavut Impact Review Board allowed the Inuit Certainty Agreement (ICA) to be admitted into evidence. However, the ICA is a supplemental addendum to the Mary River Project IIBA entered into pursuant to Article 26 of the Nunavut Agreement. We object to the slides with new information and speculative economic benefits not tied to the IIBA and not in a binding agreement being admitted into the record.

NTI also supports the submission of QIA regarding the admission of slides within the second slide deck.

Sincerely,

Neida Gonzalez
Legal Counsel for Nunavut Tunngavik Incorporated