

January 7, 2022

Marjorie Kaviq Kaluraq
Chairperson
Nunavut Impact Review Board
29 Mitik Street, PO Box 1360
Cambridge Bay, NU X0B 0C0

Dear Chairperson Kaluraq:

Written Statement from the Hall Beach Hunters and Trappers Association of Sanirajak regarding the Nunavut Impact Review Board's Assessment of Baffinland's "Phase 2 Development Proposal"

The Hall Beach Hunters and Trappers Association (HBHTA) of Sanirajak does not support Baffinland's "Phase 2 Development Proposal". The HBHTA strongly recommends that the Nunavut Impact Review Board (NIRB) does not approve the Phase 2 proposal.

Given that very little progress has been made by Baffinland to address the many outstanding issues and impacts evident to Inuit from the current level of iron ore production and shipping, at 6.0 million tonnes per annum (Mtpa), the HBHTA anticipates that it will take at least 10-15 years to address existing issues. As a result, the HBHTA:

- supports a moratorium on any ore production increase above current levels from Baffinland's Mary River mine for at least 10 years (that is at least from 2022 to 2032),
- opposes any increase in mining and shipping of iron ore from Baffinland's existing port in Milne Inlet from at least 2022 to 2032, and
- opposes any and all infrastructure construction and shipping of any iron ore to and out of Steensby Inlet from at least 2022 to 2032.

All of the above proposed developments appear as components of Baffinland's Phase 2 proposal in their 2018 *"Mary River Project - Phase 2 Proposal - Popular Summary"*.

The Board of Directors of the HBHTA and Inuit of Sanirajak are extremely concerned about the negative impacts and damage observed first hand and reported by Inuit that has been caused by the current iron ore mining and related operations since the start of the Baffinland Iron Mines (BIM) project at Mary River on Baffin Island.

Current impacts at current and previous lower levels of iron ore production and shipping by BIM have not yet been adequately documented, reported, acknowledged, mitigated and reversed by BIM and regulatory authorities.

Even the almost complete absence of narwhal in the Eclipse Sound area during July and August 2021 was not sufficient to cause BIM or regulators to press the mythical

“Red Button”, referred to by BIM representatives during the Hearings. That unprecedented scarcity of narwhal in Eclipse Sound was completely unknown to Mittimatalik elders, according to their HTO. Inuit in Sanirajak cannot trust that BIM or regulators would take any action if walrus, bowheads, narwhal, beluga, seals, migratory birds and other species in or near Foxe Basin are similarly affected if Phase 2 is approved.

Inuit Qaujimajatuqangit (IQ) has not been adequately utilized, recognized and respected by BIM or regulatory authorities. IQ is readily available in the communities where it is continuously recorded, updated, verified and applied by Inuit through our oral traditions proven during more than 3,000 years of wise environmental management by Inuit and our ancestors. Using the IQ system, Inuit could address a wide range of issues related to Baffinland operations if we are enabled to do so. Baffinland and government agencies have not shown demonstrated willingness to develop true consensus with Inuit.

Inuit have reported many impacts orally and accurately, using IQ methods to preserve its accuracy, reliably and truthfulness, but that testimony of Inuit and IQ has been largely ignored by authorities. Inuit are uniquely able to understand and interpret their own observations within the contexts of vast historical time frames and extensive geographic areas. Based on eye-witness evidence, and supported by independent photographs, videos, oral testimony and other information, accumulated in the affected communities, Inuit realistically anticipate far greater and more serious impacts will result directly and indirectly if BIM's Phase 2 proposal is approved.

The HBHTA of Sanirajak is concerned about lack of testimony and participation during the Hearings from Inuit represented by Hunters and Trappers Organizations (HTOs) and Regional Wildlife Organizations (RWOs) in at least 15 potentially affected communities in Nunavut and Nunavik. Several HTOs and RWOs from these communities apparently were not openly invited to participate in the NIRB Hearings; these include: Kinngait, Kimmirut, Nauyasat, Coral Harbour, Grise Fiord, Resolute Bay, other Kivalliq HTOs, and comparable organizations from northern Nunavik communities.

HTOs and RWOs have rights to deal with issues affecting Inuit harvesting of wildlife in order to ensure Inuit food sovereignty and security. Those roles are provided through constitutionally protected agreements, like the Nunavut Agreement. The NIRB should have invited and welcomed all potentially affected HTOs and RWOs.

According to the Nunavut Agreement, the Qikiqtaaluk Wildlife Board (QWB) has functions for general management of issues related to harvesting of wildlife among two or more member HTOs within the region. The QWB is a key trusted representative of Qikiqtaaluk Inuit in wildlife, environmental and food sovereignty issues, but the QWB was not allowed to participate as a Registered Intervenor by the NIRB. That decision by NIRB is not supported by the HBHTA, and the HBHTA calls on the NIRB to give full

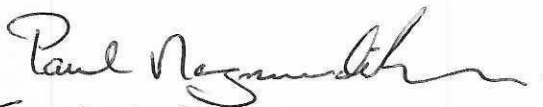
and complete consideration of the written submission that the QWB is preparing. The position of the QWB received unanimous support from all HTO representatives during its Annual General Meeting in November 2021.

BIMC has not provided sufficient evidence to clearly counter IQ evidence about existing impacts, probably because other knowledge comparable to the geographic and historic context of IQ does not exist. IQ evidence shows that BIMC operations have had significant impacts, and that mitigative measures and adaptive management have not adequately reduced the significant impacts reported by Inuit. The HBHTA cannot trust that BIM's proposed adaptive management mitigation could adequately handle the much greater impacts likely under the proposed Phase 2.

Given such little progress on these needs in recent years, the HBHTA expects that at least 10-15 more years will be required to fully evaluate the impacts of the existing development and to develop proven mitigation measures, based on a combination of IQ and scientific information, in the delicate marine and terrestrial Arctic environment which Inuit know best, especially given on-going climate change effects,

With respect, the HBHTA of Sanirajak thanks the NIRB very much for considering our submission. We look forward to the NIRB's final hearing report and the Minister's subsequent decision.

Most sincerely,

Paul Nagalik 
Chairperson *Sanirajak H.T.O*

Cc: James Qillaq, Chairperson
Qikiqtaaluk Wildlife Board

Sanirajak (Hall Beach) Hunters and Trappers Association

RESOLUTION PAPER

RE: 10-Year Moratorium on Any Increase in Ore Production by Baffinland Iron Mines

Resolution # _____

Moved by: Zillah Piallaq

Seconded by: George Innuksuk

Chairperson: Paul NACMALLIK

Whereas our Board of Directors and the Inuit of Sanirajak are extremely concerned about the negative impacts and damage observed and reported by Inuit, and caused by the current ore mining and related operations since the start of the Baffinland Iron Mines (BIM) project at Mary River on Baffin Island, NU, and

Whereas current impacts related to the BIM project at Mary River have not been adequately documented, reported, acknowledged and mitigated as yet by BIM and other authorities, and Inuit Qaujimajatuqangit (IQ) has not been adequately utilized, and

Whereas Inuit have reported many impacts orally, as is appropriate according to IQ methods, but which have been largely ignored by authorities,

Whereas, based on eye-witness evidence supported by independent photographs, videos, oral testimony and other information that has accumulated in the affected communities since BIM started its operations, Inuit anticipate that far greater and more serious impacts will result both directly and indirectly from the BIM Phase 2 Project if approved, which is likely to negatively impact wildlife, the environment and Inuit of at least 15 communities in Nunavut and Nunavik because of increased ore production, infrastructure development and shipping,

Therefore, be it resolved that the Board of Directors of the Hunters and Trappers Organization of Sanirajak strongly recommends a moratorium on any increase in ore production by Baffinland Iron Mines at their Mary River mine for at least 10 years starting in January 2022, with a possibility of extension of the moratorium if BIM does not make significant progress in addressing Inuit concerns, with the objective that BIM may begin to work collaboratively with all of the affected Hunters and Trappers Organizations (HTOs), support their independent IQ and scientific research into on-going and future BIM impacts, and develop mitigative solutions acceptable to the HTOs and Inuit of Pond Inlet, Clyde River, Arctic Bay, Igloolik and Sanirajak.

In Favour: 6 Against: 0 Abstained: 0

Carried: ✓ Not Carried: _____