



**MUNICIPALITY OF CLYDE RIVER**  
**P.O. BOX 89**  
**CLYDE RIVER, NUNAVUT**  
**X0A 0E0**  
**PHONE: 867 – 924 – 6220 ext. 205**  
**FAX: 867 – 924 – 6293**  
**E-MAIL: [cao@clyderiver.ca](mailto:cao@clyderiver.ca)**

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X0A-0E0  
ᑭᓄᓐᑭᓐ: 867-924-6220  
ᑭᓄᓐᑭᓐ: 867-924-6293

August 2, 2022

Karen Costello  
Executive Director  
Nunavut Impact Review Board  
[kcostello@nirb.ca](mailto:kcostello@nirb.ca)

**RE: Baffinland's 'Production Increase Proposal Renewal' Application**

Ms. Costello,

I am writing to you today to express the Hamlet of Clyde River's views on Baffinland's proposal for a 'renewal' of its Production Increase Proposal.

Unfortunately, the Hamlet of Clyde River is unable to meaningfully participate in the expedited process NIRB is conducting.

There was only 14 working days between NIRB's formal announcement of the process and the deadline for written comments.

It is well-known that Nunavut's municipalities and HTOs lack the staff to review the documents associated with NIRB processes, and often depend on consultants on an 'as-needed' basis to facilitate our participation. We were not provided with intervenor funding to hire consultants for this purpose. Also, because these consultants work on an 'as-needed' basis, we cannot expect them to be available on such short notice. It is also well-known that July and August are very busy times for Nunavut's communities, in terms of land-based practices. This makes it very difficult for us to consult with Elders and hunters to inform our comments on Baffinland's proposal.

When the decision was originally made to move to 6 million tonnes, Clyde River was not meaningfully consulted or involved in the process. There was no intervenor funding, so we couldn't prepare written comments on the proposal. There were no public hearings, just an informal meeting in Pond Inlet without a proper transcript of what was said. NIRB recommended the proposal not be approved, but the minister rejected that recommendation without consulting us.

Baffinland's excuses for not submitting this proposal sooner are unreasonable. The company claims it expected Phase 2 to be approved by the end of 2021, which is why it didn't apply for an extension on the 6 million tonnes.



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Nunavut Tunngavik Incorporated, Qikiqtani Inuit Association, and many municipalities and HTOs in our region opposed Phase 2 during the NIRB review. Many of the government scientists that reviewed Baffinland's proposal identified serious problems with the research the company conducted. It was unreasonable for Baffinland to assume that Phase 2 would be approved under these conditions.

By the fall of 2021 Baffinland was aware that the NIRB review would not be completed by the end of that calendar year. The company should have applied for this 'renewal' at that time, or at the very least wrote to all stakeholders asking for advice. Instead, the company waited until the very last minute, and now they're trying to force it through a process Clyde River can't really participate in. This is unacceptable. While the Hamlet of Clyde River is unable to meaningfully comment on this proposal, our position on expansions to the Mary River project is the same as it was during the Phase 2 review. The Hamlet of Clyde River supports the principle of free, prior, and informed consent. Major development projects like significant mining expansions should not be approved without the support of the Hamlets and HTOs in the most affected communities

Regards,

Alan Cormack  
Mayor of Clyde River