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August 2, 2022

Karen Costello
Executive Director
Nunavut Impact Review Board
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When the decision was originally made to move to 6 million tonnes, Clyde River was not meaningfully consulted or involved in the process.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.

