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February 27, 2026

**RE: Support for Reassessment of the Mary River Project**

Dear Ms. Filiatrault, Minister Alty, Minister Chartrand, Minister Thompson, Minister MacKinnon, Mr. Irngaut, and Mr. Akesuk:

On behalf of the Igloodik Hunters and Trappers Association (HTA), I am writing to you to strongly support the Naujaat Hunters and Trappers Organization's request to reconsider the terms and conditions of Baffinland's project certificate for the Mary River project, particularly those terms and conditions related to the Steensby Inlet port and railway.

The assessment of the Steensby port and railway is badly outdated. Environmental baseline conditions have changed and scientific understanding of the Arctic environment has evolved. Federal consultations failed to address our concerns with marine shipping. Several key terms and conditions related to project oversight are failing to fulfill their intended purpose.

### Environmental Baseline Conditions Have Changed.

According to Inuit knowledge-holders in Igloolik, there have been significant changes to the environment in the region. Sea ice conditions continue to change, affecting Inuit travel and marine mammal habitat, raising serious concerns with the cumulative effects of icebreaking shipping. Scientific research also documents ongoing environmental change in the region, including changes to sea ice.<sup>1</sup> Caribou numbers have increased in the project area, leading to a greater likelihood of interactions between the project and caribou.

### Science Has Evolved

The state of scientific understanding of shipping impacts on Arctic marine mammals has evolved since the original assessment of the Steensby Inlet port and railway. Notably, the knowledge acquired through Baffinland's monitoring programs, as well as knowledge produced through Inuit-led monitoring efforts, must be applied to the Steensby Inlet port and railway.

### Updated Adaptive Management Plans are Required

Before the Steensby Inlet port and railway are approved, the Igloolik HTA would like to see updated adaptive management plans for the Mary River project. In particular, the Igloolik HTA would like these adaptive management plans to include provisions to slow down or stop production if negative impacts are observed.

### Federal Consultations Were Insufficient

The federal government's consultations regarding permits for the Steensby Inlet port and railway did not address our concerns. Consultations and accommodations mostly focused on conditions for permits which did not address our substantial concerns with marine shipping activities. The federal government claims that our

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<sup>1</sup> Drane, A.K., Aiviq Hunters and Trappers Association, Manning, O., Peter, S. et al. (2024) Community experiences and perception of aquatic change in Kinngait, Nunavut. *Canadian Journal of Fisheries and Aquatic Sciences*. 82: 1-20;

Andrews, J., Pizzolato, L., Howell, S.E.L., Dawson, J. et al. (2018) Climate change and sea ice: Shipping in Hudson Bay, Hudson Strait, and Foxe Basin (1980-2016). *Elementa: Science of the Anthropocene*. 6(9)

concerns with marine shipping could be addressed through the development of a Cumulative Effects Framework for the Mary River project. However, our understanding is that this framework will only apply to future expansions of the Mary River mine and will not apply to the Steensby Inlet port and railway. As a result, the HTO is not convinced that the Cumulative Effects Framework will adequately address the impacts of marine shipping on our constitutionally protected Aboriginal and Treaty rights.

#### Terms and Conditions Related to Project Oversight Are Ineffective

The environmental monitoring and mitigation programs for the Mary River project are overseen by two environmental “working groups”: the Marine Environmental Working Group (MEWG) and Terrestrial Environmental Working Group (TEWG). The Igloolik HTA participates in meetings for both groups. The Igloolik HTA is deeply concerned that the MEWG and TEWG are ineffective mechanisms for mitigating and adaptively managing the environmental impacts of the Mary River project.

In its final report for Baffinland’s (rejected) Phase 2 proposal, the NIRB noted significant problems and dysfunction in working groups. The fact that MEWG and TEWG were not functioning as intended was a key factor in NIRB determining that the uncertainty of impacts of Phase 2 could not be adaptively managed.<sup>2</sup> The NIRB also found that the relationships of trust necessary to collaboratively adaptively manage impacts had degraded. The NIRB report noted that these relationships of trust are fundamental to the long-term success of development projects in Nunavut.

As far as the Igloolik HTA is concerned, the problems in the environmental working groups have not been adequately addressed. The relationships of trust necessary for adaptive management are not present. Other stakeholders, including the Government of Nunavut, have also raised critical issues with the dysfunction of working groups in recent years.<sup>3</sup>

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<sup>2</sup> Nunavut Impact Review Board (2022) Reconsideration Report and Recommendations of the Nunavut Impact Review Board Regarding a Significant Modification to the Mary River Project as Proposed by Baffinland Iron Mines Corporation under the Phase 2 Development Proposal. May, 2022. NIRB File No. 08MN053.

<sup>3</sup> Government of Nunavut. (2025) Comments on Baffinland’s Mary River project 2024 Annual Report. July 4, 2025. NIRB File No. 08MN053.

## Conclusion

The Igloolik HTA strongly supports Naujaat HTO's request for a reconsideration of the terms and conditions of Baffinland's project certificate for the Mary River mine. The Igloolik HTA submits that the reconsideration must include (but not be limited to) re-examining:

1. Terms and conditions related to shipping volumes and number of ship transits
2. Terms and conditions related to the seasonal extent of icebreaking shipping
3. Terms and conditions related to project oversight, especially the delegation of environmental oversight to the MEWG and TEWG
4. Terms and conditions related to dustfall monitoring and mitigation
5. Terms and conditions related to protecting fish habitat
6. Terms and conditions related to ballast water

Thank you for your time. The Igloolik HTA looks forward to your response.



Lloyd Idlout  
Chairperson, Igloolik Hunters and Trappers Association