



March 15, 2019

Sent via email: [info@nirb.ca](mailto:info@nirb.ca)

Ryan Barry, Executive Director  
Nunavut Impact Review Board  
29 Mitik Street, PO Box 1360  
Cambridge Bay, NU,  
X0B 0C0

**Re: Baffinland Submission on the NIRB Draft Rules of Procedure and Draft Standard Impact Statement Guidelines**

Dear Ryan,

Thank you for circulating the two documents *Draft* Rules of Procedure and the *Draft* Standard Guidelines and requesting input from interested parties.

Baffinland appreciates the NIRB's approach to soliciting feedback on updated guidance documents to aid Proponents in navigating the procedures of the review process.

At this time, Baffinland has provided a preliminary review of the documents and feels there are a few areas that warrant further discussion. In particular, Baffinland notes that although the Draft Rules of Procedure apply to the 'reconsideration of the terms and conditions of an existing Project Certificate...' no specific guidance is brought forward on the subject.

Baffinland welcomes the intent of the updated guidance recognizing the need for increased flexibility and scalability in procedural planning. As the mining industry in Nunavut is growing experience with phased development there is much to be learned from the shared experiences of the different companies.

Baffinland would like to request an extension to provide review comments on the *Draft* documents until April 30, 2019 and would like to recommend a session be held at the Nunavut Mining Symposium to discuss the draft documents.

Thank you for your consideration.

Best Regards,

A handwritten signature in black ink that reads "Megan Lord-Hoyle".

Megan Lord-Hoyle, Director Corporate Sustainability

cc:

Grant Goddard, VP, Sustainable Development and Human Resources

Lou Kamermans, Approvals Manager

Solomon Amuno, Mary River Project Monitoring Officer

