



Response to Public Comments
Application for Approval to Construct a Railway to the
Canadian Transportation Agency

June 9, 2025

Mary River Project

CTA File No. 24-44554

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A. MEL SCHELLENBERG, IGLOOLIK WORKING GROUP, IGLOOLIK, NUNAVUT RESIDENT

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IWG 01 – Community representation and proposed next steps	(a) The Igloolik Working Group, comprised of representatives from the Municipality of Igloolik and the Igloolik Hunters and Trappers Organization (HTO) (currently open), as well as Elders, youth, and other community members, would like to provide context and clarity regarding recent submissions made to the Federal Government, and public statements. We want to begin by acknowledging and appreciating the critical efforts of all individuals and organizations-including the HTO and Municipality-who have actively engaged in these discussions. We recognize the importance of strong voices and advocacy in processes that directly impact our community. The Igloolik Working Group was formally created in 2017 as a joint initiative between the Hamlet and the HTO to provide a coordinated, inclusive voice in the review of the Mary River Project. Since its inception, the group has prioritized broad community representation by including Elders, youth, and a cross-section of residents with diverse perspectives. The intention was-and continues to be-to ensure that the community's voice is not only heard but understood in full context. While we recognize that various submissions have been made on behalf of Igloolik, we are concerned that some of the messaging may not fully reflect the range of views present in our community. It is important to us that the position presented publicly and to decision-makers reflects the true collective voice of Igloolik, and not just the input of a few individuals or external advisors. This is not a criticism of any particular submission, but rather a reaffirmation of the principle that decisions of this magnitude require deep, open, and community-led dialogue. (b) To that end, the Working Group is proposing to undertake a renewed consultation process. This will include public meetings, open houses, and radio forums to gather perspectives from across our community. We believe that genuine consultation is essential and that our people should have ample opportunity to speak, ask questions, and shape the message moving forward. The Municipality of Igloolik has informed us that our budget is still active, and we will be utilizing it, as we recognize the scope and impact of the Baffinland project on our community. Throughout this process, there is a deep concern and respect for the environment, wildlife, and way of life-and rightfully so. However,	(a) Baffinland acknowledges the broad membership of the Igloolik Working Group. (b) As described in the Application and responses to other submissions to CTA, Baffinland and regulatory authorities have been consistently engaging and collaborating with Inuit, including representatives of Nunavut Tunngavik Inc., Qikiqtani Inuit Association, the Hamlets and hunters and trappers organizations, Elders, youth and other groups within the communities of Arctic Bay, Clyde River, Igloolik, Pond Inlet, Sanirajak, Kinngait and Kimmirut on the Mary River Project (including the Steensby Railway) since 2008. Opportunities for consultation on the approval of the Mary River Project (inclusive of the Steensby Railway) as well as on the activity specific permit applications (including this Section 98 process) include the following, and all forms part of the record of consultation and engagement on the Mary River Project, inclusive of the Steensby Railway: - Engagement led by Baffinland in advance of application to NIRB in 2008, including numerous meetings with landusers and Elders from Igloolik with knowledge of the Project area in order to ensure IQ was properly incorporated in the FEIS. This engagement included verification steps, and is reflected in the traditional use mapbooks that form part of the FEIS. - A NIRB-led environmental assessment review from 2008 – 2012, which included in person public hearings in Igloolik where the then mayor of Igloolik confirmed the Hamlet's support of the Project, and members of the community (including the HTO, Elders, youth and other community members) had the opportunity to ask questions and share their views. All of this information was carefully taken into account by NIRB in developing terms and conditions for the Project Certificate and in recommending approval of the Project. This recommendation was accepted by the Minister and the Project Certificate was issued in 2012. - The Nunavut Planning Commission (NPC) also carried out a process to amend the North Baffin Region Land Use Plan to add a railway corridor for the Steensby Railway. This included in person meetings and hearings and also opportunities for written submissions. The amendment was issued by the NPC in 2024, following a joint approval by Nunavut Tunngavik Inc., Government of Nunavut and the Government of Canada. - There have been continued engagement opportunities made available by NIRB since the Project commenced production, via the annual report and NIRB monitoring process as well as subsequent Project Certificate amendment applications. This process includes opportunities for written submissions and also includes community meetings. - There are also engagement and consultation opportunities made available through employment and other work opportunities at the mine site. Individuals from Igloolik have participated directly in monitoring and as	For a detailed description of the assessment, mitigations, and adaptive management applicable to the specific topics of interest to communities the Summary of Interest of Localities table, available on our website here or as Appendix 1: https://steensbyrailway.baffinland.com/_resources/pdf/stakeholder_engagement_report-20250311.pdf For a detailed description of the consultation opportunities that were made available to Inuit, including residents of Igloolik, prior to Project approval, on an ongoing basis during operations, and opportunities made available in relation to the development of the activity specific permit applications (including this Section 98 process), also see the Stakeholder Engagement Report and its appendices, available on our website here: https://steensbyrailway.baffinland.com/_resources/pdf/stakeholder_engagement_report-20250311.pdf

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	there is also significant support for this project, provided it is done the right way, with the right approach, and with proper thresholds Identified to ensure adequate impact management. We believe this has been done by the proponent, but much of this work is buried through the NIRB portal, which is extremely difficult to navigate. We also want to clarify that the Working Group does not hold any decision-making power, and it never has. The purpose of the Working Group is to gather information, review it with its members, and present that information to the decision-makers at both the Hamlet and the HTO. This ensures that they can make informed decisions on behalf of the community. Informed decision-making is key. Too often, decisions are made without access to all the necessary information. On a project of this scale, it is critical that the project be thoroughly reviewed and that the community be properly consulted before any final decision is made. This will ensure that elected officials are making informed decisions on behalf of the people they represent.	part of the environment team at Mary River. • The IIBA includes processes dedicated to ensuring community experiences are heard and considered in ongoing operations, such as the Annual Project Review Forum. The Annual Project Review Forum is an opportunity to discuss project-related issues from the Mary River Project on the five impacted communities. It is a venue for community representatives to provide comments to QIA and Baffinland on environmental impacts, mitigation and monitoring plans, and to provide recommendations for overall project improvement. In 2024, the forum was held in Igloolik: The Mary River Project Annual Project Review Forum - Igloolik QIA • The environmental working groups established under the Project Certificate (the Terrestrial Advisory Working Group and the Marine Environment Working Group) include any of the impacted community's HTOs that wish to participate as members, including the Igloolik HTO. Interpreters are available in order to ensure participants are able to express themselves in the language they feel most comfortable communicating in. • Baffinland has been conducting engagement activities through team led by Inuit team members that are Elders who are able to present Project information in Inuktitut as well as English and in a culturally relevant manner. As an example, Baffinland's engagement team has travelled to meet with Igloolik community members at least 20 times since 2021 in relation to the activity specific permit applications (such as the Section 98 application). Baffinland respects the oral tradition ingrained within Inuit culture, recognizing its profound significance in communication and societal cohesion. Baffinland uses a wide range of engagement methods to provide greater transparency and facilitate access to information. This includes posting advertisements at local Co-Ops and Hamlet offices, advertising on local radio, sharing information on a Project website, engagement through social media, including Facebook which has a particularly high amount of usage among Nunavut residents, and emails, letters to residents and groups, phone calls, virtual meetings, in person meetings, workshops, site visits and provisions of printed materials. • Baffinland employs a Community Liaison Officer (BCLO), Inuit Knowledge Holder and Community Relations Guide in and other impacted communities, which present another accessible avenue for Igloolik residents to ask questions, share concerns and share IQ about the Project. • On August 21st, 2024, Baffinland facilitated a gathering at Tulugalik near Ikpikitturjuaq, a site approximately 10km south the proposed Steensby Port site. A group of nearly 160 Inuit Elders and their families from Igloolik and Sanirajak made a request to Baffinland to return to the land where they had once lived and maintained camps. This historic gathering brought many Inuit Elders and their families to visit this land, giving them the opportunity to share wisdom passed down from earlier generations. Several other elders and dignitaries arrived by helicopter to join the group, including the president of the QIA, Olayuk Akesuk and the Mayor of Igloolik, George Auksaq. The Elders shared memories of their childhoods on the land, and spoke of the importance of returning, as part of their healing. After the speeches and other festivities, some Elders continued their journey on a caribou hunt. Baffinland truly appreciated the opportunity to listen and engage in meaningful dialogue. The Elders'	

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		wisdom and insights are invaluable, and we are committed to incorporating Inuit traditional knowledge and history of the area that was shared with us, in shaping the future of our operations. • Baffinland has heard concerns in the past about the functionality of the NIRB public registry, which are similar to those reflected in the Igloolik Working Group’s comments. In light of this, in order to ensure that key information about the project is easily accessible to those who wish to access information online, it maintains a separate public website to share key project documentation – see https://www.baffinland.com/document-portal/. Baffinland also developed a publicly accessible website specific to the Section 98 Application, here: see https://steensbyrailway.baffinland.com . As noted above, Baffinland and NIRB also regularly visit the community to present in person and give interested community members to ask questions and give feedback. • Since 2020, Baffinland has been updating baseline and other information in accordance with the Project Certificate and to meet application requirements for the remaining activity specific permits for the Steensby Railway (including the Section 98 Application). These efforts have been discussed in person in Igloolik during our community engagement meetings. Furthermore, Igloolik received opportunities to review permit application for archaeology programs, and we have integrated Igloolik participants in the archaeology program, where an Elder came to site with the project archaeologist and Territorial archaeologist in 2023. The federal government (though NPMO) have coordinated in person meetings in Igloolik to discuss the activity specific permit applications in December 2024, March 2025 and June 2025. The discussion at these meetings was not limited to the activity specific permit applications and participants were free to ask questions and share information on any topics related to the Mary River Project. Throughout these engagements, as noted by the Igloolik Working Group, Baffinland has heard a deep concern and respect for the environment, wildlife, and way of life. Mitigating negative impacts to the communities and enhancing positive benefits are a key consideration, particularly as the Steensby Component moves forward. As part of the CTA application, Baffinland prepared a Summary of Interests of Localities Table (SD-69, Appendix 4), which provides a comprehensive overview of feedback received, including feedback from Igloolik, in relation to the Steensby Component. It summarizes how interests and concerns were raised through the various mechanisms described above, and the measures that have been developed to address them. Specifically, this document includes: • A detailed Table outlining each major topic raised (e.g., freshwater protection, wildlife, cultural sites, caribou crossings, employment opportunities) and the specific issues identified. • Context for when and how these issues were raised (e.g., through direct engagement, regulatory processes, or public meetings such as the federal consultation tour held in 2024 and 2025). • References to where these concerns are addressed in previous environmental assessments and regulatory documents. • Updates on measures undertaken since the original 2012 assessments, including new studies, additional community engagement, and adaptive management plans.	

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		- Current implementation status for mitigation and monitoring actions, and identification of any outstanding or ongoing issues. Baffinland is highlighting this document to help provide the Igloolik Working Group with clear, accessible information on the topics that have been frequently identified as interests by Inuit, including Inuit from Igloolik. The mitigations reflected in the Table emphasize the importance of protecting the environment, wildlife, and traditional ways of life, and the availability of benefits of the project when managed responsibly and with proper safeguards in place. Baffinland also has summarized information for Igloolik Working Groups below on benefits experienced directly by Igloolik from the Project to date. These are in addition to the significant benefits shared among all Qikiqtani Inuit under the IIBA (described generally in the Section 98 Application): 36 Inuit from Igloolik are Baffinland employees or contractors - Inuit Payroll in Igloolik (2024) was \$1,721,109.72 - Contractors Inuit employee payroll in Igloolik (2024) was \$1,107,976 As we have emphasized in our activity specific permitting applications, and discussed with the community of Igloolik, the Steensby Railway is essential to the stable economic future of the Mary River Project. Our understanding based on our in person meeting with the Igloolik Working Group on May 28, 2025 is that the “renewed consultation process” referenced in your submission is not intended to delay any of the ongoing activity specific permitting processes, and that there will be opportunities to incorporate this information in the ongoing operations of the project and during the construction and operations phase of the Steensby Railway. The Igloolik Working Group indicates that, “<i>there is also significant support for this project, provided it is done the right way, with the right approach, and with proper thresholds Identified to ensure adequate impact management</i>”. Baffinland confirms it has also heard these statements through its own engagements, and has worked hard to develop a project which incorporates Inuit advice and IQ meets or exceeds the highest environmental and cultural protection standards. Baffinland also appreciates the statement that the Igloolik Working Group believes Baffinland has aligned with its expectations regarding overall approach, including thresholds to ensure adequate impact management. Thresholds have been established through the NIRB process, and Baffinland is measured against the predictions on which the Project approval was based in 2012. These thresholds are being added to by agreement with QIA, and Inuit-led thresholds for specified topics (such as caribou and walrus) are being incorporated into the Adaptive Management Plan. In closing, Baffinland respects the Igloolik Working Group’s statements regarding the need for ongoing engagement throughout the life of the Mary River Project, including on the Steensby Railway. Baffinland is committed to dialogue and collaboration as the project advances and will continue to work with groups such as the Igloolik Working Group throughout the life of the project, per our stakeholder engagement plans shared with CTA as part of the Section 98 Application. In addition, the NIRB will conduct a public review of the updated	

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		management plans for Steensby, as required by the Project Certificate, which provides another key opportunity for meaningful engagement.	