



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

May 14, 2025
Mary River Project
CTA File No. 24-44554

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A. MIKE GALLAGHER, VICE PRESIDENT, INTERNATIONAL UNION OF OPERATING ENGINEERS, ONTARIO RESIDENT

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IUOE 01 – Support for Baffinland	Thank you for the opportunity to provide submissions on Baffinland Iron Mine Corporation’s (“Baffinland’s”) application (the “Application”) to construct a railway line from the Mary River Mine (the “Mine”) to Steensby Inlet (the “Steensby Rail Project”). The International Union of Operating Engineers, Local 793 (“Local 793”) is the legal representative of over 750 production employees working at the Mine and has been since early 2019. Local 793’s charter includes the geographic jurisdiction to represent employees throughout the Territory of Nunavut. Many of the production employees Local 793 represents at the Mine are Inuit and reside in the Qikiqtani Region of Nunavut. Other workers come from every province across Canada to work at the Mine. As the trade union representing these employees, Local 793’s primary responsibility and interests are to achieve collective agreement provisions that protect their jobs, enhance their terms and conditions of employment and provide job security as much as possible into the long-term future. On behalf of our members, we fully support Baffinland’s Application to build the Steensby Rail Project. Approving the Application will help to ensure the long-term operation and success of the Mine for many decades, which will in turn provide substantial socio- economic benefits for Nunavut and especially the impacted communities in which our members reside. Local 793 strongly believes that without the Canadian Transportation Agency’s approval of Baffinland’s Application, the Mine will not be sustainable which will inevitably result in massive layoffs of employees. This drastic result was already demonstrated to a lesser extent last year when Baffinland was forced to lay off approximately 20 per cent of its direct and contract employees. The decision to reduce the workforce was, in large part, a subsequent consequence of not receiving federal government approval from the Minister of Northern Affairs to build its northern Phase 2 railway project. This would have allowed Baffinland to double its shipping tonnage to 12 million tonnes per year, the level needed to be sustainable. In short, giving approval for the Steensby Rail Project will return long-term financial stability to the Mine by allowing it to increase annual production to 18 million tonnes. This will ensure that the Mine can continue to operate and flourish and that Baffinland employees and their families can continue to benefit from this work for decades to come. Therefore, on behalf of the unionized employees of Baffinland, Local 793 writes to express its full support of the location of the Steensby Rail Project and makes the following submissions as to why: 1. The Steensby Rail Project will promote the long-term success and prosperity of the impacted communities: Baffinland is one of the largest private-sector employers in Nunavut. Local 793 has heard from Inuit employees at the Mine that they rely on their work at Baffinland as a source of steady income and an opportunity to upgrade their skills. Some relevant statements include: • “It’s providing me a job and a chance to become a tradesperson. Also, it provides opportunities for the people of Nunavut, certain jobs such as Millwright, Welder, Heavy Duty Mechanic, Electrician, Machinist, etc.” (Timosie Arnaqjuaq, Arctic Bay) • “The company hires many people that I know and we all benefit from it. We do not have	Baffinland thanks the International Union of Operating Engineers, Local 793’s (the Union) for its comprehensive submission in support of Baffinland’s Section 98 Application to advance the Steensby Rail. Baffinland recognizes and appreciates the Union’s long-standing role as the representative of over 750 employees at the Mary River Mine, including a significant number of Inuit workers from the Qikiqtani Region of Nunavut. Baffinland also acknowledges the Union’s broader commitment to advancing equitable access to employment, skills development, and long-term economic opportunity for its members, many of whom reside in Nunavut. Baffinland welcomes the Union’s endorsement of the Application and values the submission’s recognition of the following key points: • Baffinland shares the Union’s view that the Steensby Railway is essential to the long-term viability of the Mary River Mine. As noted, sustainable operations at increased production levels are critical to preserving existing jobs, creating additional employment opportunities, and generating lasting economic benefits across Nunavut and in Canada. • The environmental benefits of transitioning from truck-based ore transport to rail-based transport, which will significantly reduce road dust and lower emissions. The high-grade iron ore produced at the Mine, which requires less processing and produces no tailings, is uniquely position to support the production of low-carbon “green” steel crucial for global decarbonization efforts. • The role the Steensby Rail Project plays in strengthening Canada’s Arctic sovereignty, enhancing Northern infrastructure, and aligning with the federal government’s broader nation-building and “Build Canada Strong” initiatives. • The transformative potential of the Steensby Project, including construction of a deep-water port, for unlocking new marine access opportunities, strengthening economic resilience, and fostering long-term territorial prosperity. Baffinland also recognize the profound risks to employment and economic stability that would arise if the project were not approved. The experience of priori workforce reductions underscores the need for timely approvals to secure operational continuity and avoid significant negative impacts on employees and their communities. This letter powerfully illustrates how approval of the Steensby Rail Project is essential not only for protecting current livelihoods, but for building a stronger, more sustainable future for the North. Baffinland is grateful for the Union’s continued support in advancing responsible and inclusive development in Nunavut.	

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	enough opportunities in the local communities that give the Nunavummiut the training and continuous learning in industrial settings.” (Albert Aglak, Pond Inlet) • “It provides jobs for the people of Arctic Bay, steady income, a future for me and my family. We need jobs for the next generation.” (Jamie Ogallak, Arctic Bay) • “Helps put money back in my community.” (Marilyn Ikeperiar, Hall Beach) 2. The Steensby Rail Project will decrease dust and emissions in the environment and help reduce the global carbon footprint: Iron ore at the Mine is currently transported by haul trucks using a tote road. This transportation method creates road dust and truck emissions, including carbon dioxide, which would be eliminated by transporting the iron ore by rail via the Steensby Rail Project. Supporting Baffinland’s continued iron ore mine operation also contributes to the production of “green” steel. The iron ore deposits at the Mine are among the highest-grade in the world, and therefore require less of the processing which cause harmful emissions. As well, no tailings production is required. Low-carbon “green” steel is necessary for virtually every aspect of global decarbonization. By supporting Baffinland, Canada’s North is at the centre of efforts to reduce the global carbon footprint. Local 793 understands that Baffinland is working in cooperation with ROGESA Roheisengesellschaft Saar mbH (“ROGESA”) to have its iron ore used in ROGESA’s low-carbon “green” steel production. The Steensby Rail Project will allow Baffinland to increase production of its high-grade iron ore and make it available for use as a key component in the effort towards global decarbonization. 3. The Steensby Rail Project will benefit the broader economy of Nunavut and promote economic reconciliation: Nunavut’s economy will substantially benefit from both the construction and operation of the Steensby Rail Project. With the Canadian Transportation Agency’s approval of the Application, Baffinland will be able to expand its mining operation and as a result create hundreds of additional quality job opportunities throughout the construction process and year-round operation of the railway. As well, the Steensby Rail Project, with an estimated cost of \$3.5 billion, will substantially increase the gross domestic product of Nunavut and provide long-term community growth and business development. Local 793 wants to be a positive influence on economic reconciliation with the indigenous peoples of this country. We take equitable access to jobs, training and work opportunities very seriously. Ensuring long-term employment and careers at Baffinland through the Steensby Rail Project is a very positive way to ensure that our Inuit members living in the Qikiqtani Region are able to play a meaningful role in the economy of Nunavut. 4. The Steensby Rail Project is critically important to the current socio-political and economic climate: The Steensby Rail Project is particularly timely given the current socio-political and economic climate. Largely in response to trade war uncertainty, Prime Minister Carney announced various resource development projects with the aim of providing energy security and supporting other economic development opportunities in the North. He has promised to invest in Northern infrastructure and build transportation networks to connect natural resource extraction sites to rail lines and roads. These		

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	development projects highlight an increased sense of urgency with respect to bolstering sovereignty and economic resilience in the North. The Steensby Rail Project is completely in line with and fully supports these “Build Canada Strong” efforts and will help to unleash the North’s economic potential. A critical part of the Steensby Rail Project is building a deep-water port. The development of high-quality port infrastructure can be a prerequisite for successful growth strategies, support the growth of manufacturing and logistics, create employment, and increase income levels. Crucially, the deep-water port would allow Canada to respond to greater marine access and activity in the North. The construction of a deep-water port is a further “nation-building” project and is clearly aligned with Canada’s national security and economic interests which, themselves, are of interest to all. On behalf of our members, and for the reasons noted above, Local 793 urges the Canadian Transportation Agency to determine that the location of the Steensby Rail Project is reasonable, and as a result, approve Baffinland’s Application.		