



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

May 6, 2025
Mary River Project
CTA File No. 24-44554

TABLE OF CONTENTS

A. Hudson Lester, General Manager, NWB & Nunavut Chamber of Mines, Nunavut Resident 2

NCM 01 – Support for Baffinland 2

A. HUDSON LESTER, GENERAL MANAGER, NWB & NUNAVUT CHAMBER OF MINES, NUNAVUT RESIDENT

ID	Comment	Response	Supporting Documents
NCM 01 – Support for Baffinland	Support for Baffinland Iron Mine’s Application The NWT & Nunavut Chamber of Mines is writing to express our strong support for Baffinland Iron Mines’s application for constructing a railway line from the Mary Rive Mine to Steensby Inlet. If approved, Baffinland Iron Mines Corporation would be able to expand iron ore production levels through the advancement of the Steensby port and rail project. The Mary River iron deposits are among the highest-grade in the world, presenting an important economic opportunity for Nunavut. The mine’s contributions to training, employment, and local business investment have already demonstrated its importance to the territory’s economic well-being. Ensuring its long-term viability will allow it to remain a pillar of growth for generations to come. The Importance of the Mary River Deposit for Northern Economic Development The Mary River mine has already made a substantial impact on Nunavut’s economy, directly contributing to Inuit employment and business development, as well as generating 1/3 of the 46.7% GDP contributions. Beyond these immediate benefits, the additional untapped deposits at Mary River offer the potential to transform the operation into a multi-generational mine and build economic resilience. By supporting continued and expanded operations, we can ensure that Nunavut remains a strong economic force in Canada’s North. High Purity Iron at Mary River is a Canadian Critical Mineral Critical minerals are key to helping reduce global climate change. In June, 2024, Canada added high- purity iron ore to its official Critical Minerals List. With its high purity, Mary River iron ore is simply quarried and crushed in Nunavut reducing its environmental footprint, transported to port and then shipped directly to smelters. Mary River is a small mine and needs higher production for economic resilience From a global perspective, the Mary River mine at its current 4 million tonnes per annum is an unusually small iron mine. Its current production is just a fraction of even the smallest of the world’s top 20 iron mines. (see: https://abcdust.net/the-20-largest-iron-ore-mines-in-the-world/). Even having high-purity iron, with such poor economy of scale, the small size exposes the mine economically to the volatile market price changes, reducing its economic resilience. Mary River needs to increase production to protect its future mine life and the significant benefits it creates. This is the key reason for advancing the Steensby rail and port project with approval of Baffinland’s railway line application. Addressing the Critical Lack of Infrastructure The full potential of Mary River cannot be realized without addressing the infrastructure gap that continues to hinder development in the region. Unlike past mining projects in Canada, which benefited from government investment in critical infrastructure, northern operators today must finance large-scale infrastructure independently. The Steensby rail and port project with its identified rail alignment is	Baffinland appreciates the submission from the NWB & Nunavut Chamber of Mines (the Chamber), expressing support for the advancement of the Steensby Rail and Port. The Chamber’s letter provides a thoughtful summary of the economic, strategy, and social significance of the Mary River Project, particularly with respect to the potential long-term benefits to Nunavut. Baffinland acknowledges the Chambers’s recognition of the following important points: • The strategic importance of Mary River’s high-purity iron ore, recently added to Canada’s Critical Minerals List, and its role in supporting global decarbonization efforts. • The need to improve regional infrastructure to unlock the full value of Canada’s Arctic mineral resources, especially through private sector investment. • The current production limitations at Mary River and the associated risks to economic resilience, which support the rationale for advancing Steensby. • Baffinland’s demonstrated commitment to environmental stewardship, adaptive management and meaningful engagement with Inuit partners and local communities. • The potential for Steensby to support and strengthen northern sovereignty, Indigenous economic participation, and positioning Nunavut as a key player in Canada’s critical minerals strategy. Baffinland remains committed to responsibly advancing the Project in accordance with the terms and conditions of Project Certificate 005, and in collaboration with Inuit organizations, communities, and regulators. The Company values the Chamber’s ongoing advocacy and looks forward to continued engagement as the Project progresses.	

ID	Comment	Response	Supporting Documents
	a necessary step toward unlocking the full potential of the Mary River deposits, enabling efficient transportation of ore and other operations related freight. Developing Canada’s first Arctic railway is an ambitious but essential endeavor. This significant capital investment will provide Nunavut with long-term economic stability, create jobs during construction and operation, and support the region’s ability to better compete on the global market. Allowing Baffinland to maintain stable production levels is crucial to ensuring investment certainty and securing the funding necessary to move the Steensby project forward. Strong Environmental Mitigation and Community Engagement Baffinland has demonstrated an ongoing commitment to environmental stewardship and community engagement. The company has worked extensively with Inuit organizations, local communities, and regulators to develop responsible mining practices that minimize environmental impacts while maximizing local benefits. Baffinland’s environmental mitigation strategies, including adaptive management plans, monitoring programs, and wildlife protection measures, ensure that mining activities remain sustainable. The extensive consultation process with Inuit stakeholders underscores the project’s commitment to responsible development, ensuring that traditional knowledge and local priorities shape project planning and operations. In designing the proposed rail alignment Baffinland has advanced comprehensive geotechnical studies, supplemental baseline studies and refined the monitoring programs and mitigation measures, all consistent with the guidance and requirements within their approved Project Certificate 005. The Stakeholder Engagement Report filed with the CTA also provides an extensive record of their engagement with communities and other stakeholders, the concerns raised over the years, and the solutions Baffinland has put forward. While no Project can be expected to resolve all the concerns raised in relation to a major project development, the Application clearly demonstrates the best efforts of Baffinland to do so. For any outstanding matters their plans for adaptive management are both reasonable and practical, and their record of responding to community concerns in relation to their current project is robust and reliable. A Timely Project The Steensby Project was approved in 2012, but volatile iron ore prices delayed its construction. Since then, and quite unexpectedly, the global politics have changed significantly. Today, there is increased sensitivity, recognition and need to bolster Canada’s Arctic sovereignty and the country’s and Indigenous economic resilience. Resource development projects are recognized as key to these ends. Supporting Nunavut’s Future Expanding production from the Mary River mine with a successful railway line application represents a unique opportunity to drive economic growth, address long-standing infrastructure deficits, and demonstrate world-class environmental and community engagement practices. We urge you to approve Baffinland’s application, allowing production to expand to its approved level. Keeping Mary River strong, resilient, and sustainable is in the best interest of Nunavut and the Inuit communities that rely on its success.		