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To: secretariat
Subject: [Externe/External]:Baffinland Steensby Railway Consultation Call for comments

I appreciate the opportunity to provide comments on Baffinland's proposed Steensby Railway project. As an advocate for Inuit interests and the environment, I have several concerns regarding the project's potential impacts on local communities, wildlife, and the environment.

1. How would the location or operation of the proposed railway line affect your interests? Describe any expected benefits or concerns you have with the proposed line.

The proposed railway's location and operation will significantly affect Inuit communities' traditional hunting grounds and disrupt local wildlife populations. The railway's construction through permafrost regions will alter caribou migration routes, potentially hindering their access to calving grounds. This disruption poses a threat to the subsistence hunting practices that are integral to Inuit culture and food security.

Additionally, the project's plan for year-round shipping through Foxe Basin raises concerns about increased vessel traffic and icebreaking activities. Such operations will adversely affect marine mammals like narwhals, bowhead whales, and walrus, which are culturally and nutritionally vital to Inuit communities.

Coastal communities that once thrived on fishing have seen their way of life vanish due to overfishing and industrial pollution. When fish stocks collapse, families who have fished for generations are left with no means to sustain themselves. For Inuit communities, hunting and fishing are just as critical—not just for food, but for culture, identity, and survival. The Steensby Railway, by disrupting wildlife migration and marine habitats, risks causing the same kind of irreversible devastation that coastal fisheries have suffered. And once it's gone, there's no bringing it back.

2. If you have concerns about the proposed railway line, what could be done to address them?

To mitigate these impacts, it is crucial for Baffinland to:

- **Reassess Environmental Impact Assessments:** Given the significant environmental and climatic changes since the project's initial approval in 2012, updated assessments are necessary to reflect current conditions and data.
- **Implement Robust Wildlife Protection Measures:** Design and construct the railway with features that facilitate safe wildlife crossings, such as appropriately graded embankments and crossing structures tailored to caribou movement patterns.

- Engage in Meaningful Consultation: Foster ongoing dialogue with Inuit communities to incorporate traditional knowledge and address concerns related to hunting practices and environmental preservation.
- Adopt Stringent Shipping Protocols: Limit shipping during critical periods for marine life, reduce vessel speeds to minimize noise pollution, and avoid icebreaking activities that could disrupt sea ice habitats.

3. Baffinland has provided information about the project in its application and supplemental documents (see Reference materials below). Is this information sufficient to understand how this construction and operations of the proposed railway line can affect you? If not, please describe what type of additional information you would need to know about the impact of the railway line on you.

While Baffinland has supplied various documents under Section 98 of the Canadian Transportation Act, there are areas where additional information is necessary to fully comprehend the project's potential impacts:

- Updated Environmental Data: Current studies on caribou populations, permafrost stability, and marine ecosystems are essential to assess the project's environmental footprint accurately.
- Detailed Mitigation Strategies: Comprehensive plans outlining specific measures to protect wildlife and support Inuit subsistence activities should be clearly articulated.
- Cumulative Impact Analysis: An evaluation of the combined effects of the railway, increased shipping, and other industrial activities in the region is needed to understand the broader environmental and social implications.

While the Steensby Railway project has the potential to contribute economically, it is imperative that its development does not come at the expense of Inuit livelihoods, cultural practices, and the fragile Arctic environment. A thorough reassessment and the implementation of stringent mitigation measures are essential to ensure that the project aligns with the principles of environmental sustainability and respect for Indigenous rights.