



May 1, 2025

Sent via email to: info@otc-cta.gc.ca

To Whom It May Concern,

The NWT & Nunavut Chamber of Mines (the “Chamber”) is the voice of the Northern mining and exploration industry and has been advocating for a healthy northern mineral sector since 1967. The Chamber’s primary objective is to encourage, assist and stimulate environmentally responsible, prosperous, and orderly development and growth of mining and mineral exploration in the NWT and Nunavut.

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 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.

We appreciate your attention to this important matter and look forward to your continued support for responsible resource development in Nunavut.

Sincerely,

Hudson Lester

Hudson Lester
General Manager – Nunavut

CC./ Lou Kamermans, Baffinland Iron Mines Corp.