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**ፎልዲ ለ - ልዩ ልዩ ስራ ለማግኘት የሚያስፈልጉት**

የሥራ አፈጻጸም	ጥቅም 30, 2022 ለሥራ አፈጻጸም የሥራ አፈጻጸም	ሥራ አፈጻጸም ለሥራ አፈጻጸም	ጥቅም 31, 2021 የሥራ አፈጻጸም
የሥራ አፈጻጸም ለሥራ አፈጻጸም	<b>97%</b>	83 ሥራ አፈጻጸም ለሥራ አፈጻጸም -9 የሥራ አፈጻጸም ለሥራ አፈጻጸም <hr/> 74 የሥራ አፈጻጸም 72 የሥራ አፈጻጸም ለሥራ አፈጻጸም ሥራ አፈጻጸም  97% ሥራ አፈጻጸም ለሥራ አፈጻጸም	97%
ለሥራ አፈጻጸም ለሥራ አፈጻጸም ለሥራ አፈጻጸም	<b>100%</b>	87 ሥራ አፈጻጸም ለሥራ አፈጻጸም ለሥራ አፈጻጸም -18 የሥራ አፈጻጸም ለሥራ አፈጻጸም ለሥራ አፈጻጸም <hr/> 69 የሥራ አፈጻጸም ለሥራ አፈጻጸም ለሥራ አፈጻጸም 69 የሥራ አፈጻጸም ለሥራ አፈጻጸም ለሥራ አፈጻጸም ለሥራ አፈጻጸም  100% ሥራ አፈጻጸም ለሥራ አፈጻጸም ለሥራ አፈጻጸም	99%
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## Baffinland Iron Mines Corporation

Agreed-Upon Procedures on the  
Commitments Audit Protocol report to the  
Nunavut Impact Review Board

For the period ending June 30, 2022



Tel: 519 824 5410  
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BDO Canada LLP  
245 Hanlon Creek Blvd  
Guelph ON N1C 0A1 Canada

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## Agreed-Upon Procedures Report

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To: Baffinland Iron Mines Corporation

### Purpose of this Agreed-Upon Procedures Report

Our report is solely for the purpose of assisting Baffinland Iron Mines Corporation (the "Entity") in meeting its reporting requirements and may not be suitable for another purpose.

### Management's Responsibilities

Management has acknowledged that the agreed-upon procedures are appropriate for the purpose of the engagement. Management is responsible for the subject matter on which the agreed-upon procedures are performed.

### Practitioner's Responsibilities

We have conducted the agreed-upon procedures engagement in accordance with the Canadian Standard on Related Services (CSRS) 4400, *Agreed-Upon Procedures Engagements*. An agreed-upon procedures engagement involves our performing the procedures that have been agreed with the Entity, and reporting the findings, which are the factual results of the agreed-upon procedures performed. We make no representation regarding the appropriateness of the agreed-upon procedures.

This agreed-upon procedures engagement is not an assurance engagement. Accordingly, we do not express an opinion or an assurance conclusion.

Had we performed additional procedures, other matters might have come to our attention that would have been reported.

### Professional Ethics

We have complied with the relevant ethical and independence requirements set out in rules of professional conduct / code of ethics in Canada.

### Procedures and Findings

We have performed the procedures described below on the Commitments Audit Protocol report for the period ending June 30, 2022, which were agreed upon with the Entity.

Procedures	Findings
1. Obtain the Commitments Audit Protocol report from Baffinland Iron Mines Corporation.	We obtained the Commitments Audit Protocol report from Baffinland Iron Mines Corporation.
2. Read the Instructions and Introduction tabs on the Commitments Audit Protocol report.	We read the Instructions and Introduction tabs on the Commitments Audit Protocol report.
3. Record the auditor's name and report date of the specified auditing procedures at the top of the Resolutions & Commitments section, Project Certificate (PC) Conditions section and Inuit Impact and Benefit Agreement (IIBA) Commitments section on the Commitments Audit Protocol report (Appendix B).	We recorded our name and the report date of the specified auditing procedures at the top of the Resolutions & Commitments section, Project Certificate (PC) Conditions section and Inuit Impact and Benefit Agreement (IIBA) Commitments section on the Commitments Audit Protocol report (Appendix B).

<p>4. For each Audit Question on the Resolutions &amp; Commitments section, PC Conditions section and IIBA Commitments section in the Commitments Audit Protocol report, obtain documented evidence and/or interview personnel from Baffinland.</p>	<p>We read each Audit Question in the Resolutions &amp; Commitments section, PC Conditions section and IIBA Commitments section in the Commitments Audit Protocol report, and when applicable, obtain documented evidence and/or interviewed personnel from Baffinland as deemed appropriate.</p>
<p>5. For documented evidence referred to in procedure 4 above, record a file name and/or url that links to the source of documented evidence, including page number if reasonable.</p>	<p>For documented evidence referred to in procedure 4 above, we provided a file name and/or url that links to the source of documented evidence, including page number if reasonable. Please see Appendix B, the Commitments Audit Protocol report, for detailed results pertaining to each Audit Question per section.</p>
<p>6. For interviewing personnel referred to in procedure 4 above, record the position of the interviewee and document what was discussed.</p>	<p>For interviewing personnel referred to in procedure 4 above, we recorded the position of the interviewee and documented what was discussed. Please see Appendix B, the Commitments Audit Protocol report, for detailed results pertaining to each Audit Question per section.</p>
<p>7. For each Audit Question referred to in procedure 4 above, record whether there was evidence provided, in the form of documented evidence and/or interview notes, that supported the completion of the audit question. This is to be answered either Yes, No or Non-applicable.</p>	<p>For Audit Questions referred to in procedure 4 above, we recorded whether evidence was provided that supported the completion of the audit question.</p> <p>For Audit Questions deemed to be non-applicable (for example, relating to future phases of the project), we have documented the interviewee and noted what was discussed. We also removed the question from the 'Completion Rate' calculation at the top of the relevant section.</p> <p>We have provided Appendix A - Summary of Results - to detail how many Audit Questions have had evidence provided supporting the completion of the audit question or were non-applicable for each section.</p> <p>Please see Appendix B, the Commitments Audit Protocol report, for detailed results pertaining to each Audit Question per section.</p>

Appendix A - Summary of Results

Audit Section	June 30, 2022 Completion Rate	Details of Completion Rate	December 31, 2021 Completion Rate
Resolutions & Commitments	97%	83 total Audit Questions - 9 Audit Questions non-applicable <hr/> 74 Audit Questions applicable 72 Audit Questions where evidence was provided  97% Completion Rate	97%
Project Certificate (PC) Commitments	100%	87 total Audit Questions -18 Audit Questions non-applicable <hr/> 69 Audit Questions applicable 69 Audit Questions where evidence was provided  100% Completion Rate	99%
Inuit Impact and Benefit Agreement (IIBA) Commitments	92%	57 total Audit Questions - 9 Audit Questions non-applicable <hr/> 48 Audit Questions applicable 44 Audit Questions where evidence was provided  92% Completion Rate	92%

Appendix B - Commitments Audit Protocol report

## Resolutions and Commitments

Resolutions and Commitments

Name of Auditor:	BDO Canada LLP
Date of Audit:	2022-09-30

Completion Rate:	
Total # of audit questions with evidence provided supporting completion of the audit question	72
Percentage of applicable audit questions with evidence provided supporting completion of the audit question	97%

Concern #	Topic Area	Concern/Topic	Commitment Statement	Audit Question	Evidence Provided			Documented Evidence Changed (Yes or No)	Interview Notes Changed (Yes or No)	Status	Responsible Position	Documented Evidence	Interview Notes (Highlight the cell in Yellow if any changes to the Interview Notes were made)
					Yes	No	Non-applicable						
				1.a.1. Does a communication system exist?	x			Yes	Yes	Done	Sustainability Specialist / Manager Community Resource Services	<p>2020 SOP version "07132020_BIM_SOP_Communications Protocol_Shipping" was modified in 2021 and formally finalized in July 2021 "BAF-PHI-820-PRO-0001 r0 - Internal Communications Protocol for Shipping Activities". Specific details on communications included in Section 4 (starts on page 7 of pdf) (refer to A-3).</p> <p>Refer to anticipated 2022 communications as presented in "A-7, 14-Jun-2022 MEWG Meeting Minutes" (page 5 of pdf) during MEWG meeting held on June 14, 2022 (See slides 14-16 in A-21).</p> <p>Refer to slide 10 for 2021 communications summary in deck provided to MHTO on July 7 2022 (A-4 2021 MHTO End of Shipping; 2022 Start of Shipping Meeting) and slides 27-32 for Communications Protocol summary for 2022 season.</p> <p>Refer to "Communications" Section, page 7, in "A-1, Shipping and Marine Monitoring Summary 2022 Shipping Season" (refer to A-1). This summary, and additional information pertaining to 2022 shipping communications can be found at: <a href="https://www.baffinland.com/operation/shipping-and-monitoring/">https://www.baffinland.com/operation/shipping-and-monitoring/</a></p> <p>Refer to details pertaining to July 13, 2022 radio show in Section 4.2 of the 2022 Marine Shipping and Vessel Management Report (refer to B-18).</p>	<p>Sustainability specialist/Manager, Community Resource Services (Sept 2022) *** Note that Baffinland does not ship between January and June*** Documents applicable to the 2022 shipping season are updated based on previous year documents before start of shipping season (i.e., before July 15). By end of June 2022, the 2022 shipping fact sheet version had yet to be finalized. However, it was available in July 2022, including on Baffinland website in both Inuktitut and English (<a href="https://baffinland.com/operation/shipping-and-monitoring/">https://baffinland.com/operation/shipping-and-monitoring/</a>).</p> <p>Summary of communications protocol highlights shared with members of the Marine Environment Working Group on June 14, 2022 and included past 2021 communications and anticipated communications for 2022.</p> <p>Communications are also discussed annually at the end of season and pre-season shipping meetings. Powerpoint slides were shared with MHTO on July 7, 2022, after multiple attempts at scheduling a meeting (refer to A-4 2021 MHTO End of Shipping 2022 Start of Shipping Meeting) slides. No comments were received from MHTO indicating any desired modifications to the communications approach utilized in 2021.</p> <p>A radio show was also held on July 13th, 2022 in Pond Inlet to provide information to community on past and upcoming shipping seasons and to obtain feedback. No comments received on suggested changes to current approach.</p>
				1.a.2. Does the communication system include regular vessel schedule updates to the community?	x			Yes	Yes	Done	Sustainability Specialist / Manager Community Resource Services	<p>2020 SOP version "07132020_BIM_SOP_Communications Protocol_Shipping" was modified in 2021 and formally finalized in July 2021 "BAF-PHI-820-PRO-0001 r0 - Internal Communications Protocol for Shipping Activities". Specific details on communications included in Section 4 (starts on page 7 of pdf) (refer to A-3).</p> <p>Also regularly through introduction of 10-vessel line-up email sent to hamlet and MHTO (bilingual); refer to A-5 for the 2022 Rolling Shipping Schedule. The most recent email communication was sent August 22nd, 2022, which included a tentative schedule up until September 2nd outlining estimated times at berth and estimated times of departure for each proposed vessel.</p> <p>All vessel locations available online on Baffinland website over entire duration of shipping season: <a href="https://www.baffinland.com/operation/shipping-and-monitoring/">https://www.baffinland.com/operation/shipping-and-monitoring/</a></p> <p>Refer to "Communications" Section, page 7, in "A-1, Shipping and Marine Monitoring Summary 2022" (refer to A-1). This summary, and additional information pertaining to 2022 shipping communications can be found at: <a href="https://www.baffinland.com/operation/shipping-and-monitoring/">https://www.baffinland.com/operation/shipping-and-monitoring/</a></p> <p>Refer to details pertaining to July 13, 2022 radio show in Section 4.2 of the 2022 Marine Shipping and Vessel Management Report (refer to B-18).</p> <p>Facebook posts available here: <a href="https://www.facebook.com/baffinland.shipping.7">https://www.facebook.com/baffinland.shipping.7</a></p> <p>Refer to A-5 for the 2022 Rolling Shipping Schedule.</p>	<p>Manager, Community Resource Services (Sept 2021). Daily vessel communications through combination of marine VHF radio, Facebook posts.</p> <p>Regular schedule updates (rolling schedule) sent to MHTO and Hamlet on Baffinland's anticipated schedule.</p> <p>Live tracking of vessels on Baffinland website available 24 hrs/day, 7 days a week (<a href="https://www.baffinland.com/operation/shipping-and-monitoring/">https://www.baffinland.com/operation/shipping-and-monitoring/</a>)</p> <p>Sustainability specialist/Manager, Community Resource Services (Sept 2022): Communications approach to be adopted in 2022 will remain similar to 2021 unless changes are requested by the community. This includes online access to latest vessel locations, daily updates through marine VHF radio, and Facebook posts by locally hired Baffinland Shipping Monitors. Also regularly through -rolling schedule email sent to hamlet and MHTO (bilingual). Radio show is also planned for prior to start of shipping season to obtain feedback on frequency of updates (in 2022, completed on July 13, 2022)</p>
		1.a. At a minimum, the communication system shall include the following: Regular vessel schedule updates to be provided to the community on a consistent basis in addition to on-line tracking, a local message board will be erected in the community, additional ways of effectively communicating changes to community members to be explored.		1.a.3. Are the regular vessel schedule updates to the community CONSISTENT? (i.e. have any updates been omitted or not fulfilled in the schedule?)	x			Yes	Yes	Done	Sustainability Specialist / Manager Community Resource Services	<p>Daily through marine VHF radio, Facebook posts by locally hired Baffinland Shipping Monitors</p> <p>2020 SOP version "07132020_BIM_SOP_Communications Protocol_Shipping" was modified in 2021 and formally finalized in July 2021 "BAF-PHI-820-PRO-0001 r0 - Internal Communications Protocol for Shipping Activities". Specific details on communications included in Section 4 (starts on page 7 of pdf) (refer to A-3).</p> <p>Refer to "Communications" Section, page 7, in "A-1, Shipping and Marine Monitoring Summary 2022" (refer to A-1). This summary, and additional information pertaining to 2022 shipping communications can be found at: <a href="https://www.baffinland.com/operation/shipping-and-monitoring/">https://www.baffinland.com/operation/shipping-and-monitoring/</a></p> <p>Refer to details pertaining to July 13, 2022 radio show in Section 4.2 of the 2022 Marine Shipping and Vessel Management Report (refer to B-18).</p> <p>Refer to A-5 for the 2022 Rolling Shipping Schedule.</p>	<p>Sustainability specialist/Manager, Community Resource Services (Sept 2022): *** Note that Baffinland does not ship between January and June*** Documents applicable to the 2022 shipping season are updated based on previous year documents before start of shipping season (i.e., before July 15). By end of June 2022, the 2022 shipping fact sheet version had yet to be finalized. However, it was available in July 2022, including on Baffinland website in both Inuktitut and English (<a href="https://baffinland.com/operation/shipping-and-monitoring/">https://baffinland.com/operation/shipping-and-monitoring/</a>).</p> <p>Every year, a summary of shipping-related communications is provided in the annual Marine and Shipping Vessel Management Report.</p>

Resolutions and Commitments

Name of Auditor:	BDO Canada LLP
Date of Audit:	2022-09-30

Completion Rate:	
Total # of audit questions with evidence provided supporting completion of the audit question	72
Percentage of applicable audit questions with evidence provided supporting completion of the audit question	97%

Concern #	Topic Area	Concern/Topic	Commitment Statement	Audit Question	Evidence Provided			Documented Evidence Changed (Yes or No)	Interview Notes Changed (Yes or No)	Status	Responsible Position	Documented Evidence	Interview Notes (Highlight the cell in Yellow if any changes to the Interview Notes were made)
					Yes	No	Non-applicable						
1	Shipping	General Communications with the community of Pond Inlet and the overall Shipping Management System requires confirmation and improved awareness.		1.a.4. Is a local message board erected in the community?	x			Yes	Yes	Done	Sustainability Specialist / Manager Community Resource Services	2020 SOP version "07132020_BIM_SOP_Communications Protocol_Shipping" was modified in 2021 and formally finalized in July 2021 "BAF-PH1-820-PRO-0001 r0 - Internal Communications Protocol for Shipping Activities". Specific details on communications included in Section 4 (starts on page 7 of pdf) (refer to A-3)  Refer to "Communications" Section, page 7, in "Shipping and Marine Monitoring Summary - 2022 Shipping Season" (refer to A-1). This summary, and additional information pertaining to 2022 shipping communications can be found at: <a href="https://www.baffinland.com/operations/shipping-and-monitoring/">https://www.baffinland.com/operations/shipping-and-monitoring/</a>  Refer to Section 4.1 and 4.2 of the 2022 Marine Shipping and Vessel Management Report (B-18), 2022 NIRB Marine Shipping and Vessel Management Report.	Sustainability specialist/Manager, Community Resource Services (Sept 2022). **Note that Baffinland does not ship between January and June** Documents applicable to the 2022 shipping season are updated based on previous year documents before start of shipping season (i.e. before July 15). By end of June 2022, the 2022 shipping fact sheet version had yet to be finalized. However, it was available in July 2022, including on Baffinland website in both Inuktitut and English ( <a href="https://baffinland.com/operations/shipping-and-monitoring/">https://baffinland.com/operations/shipping-and-monitoring/</a> )  The above link includes contact information for community-based Baffinland shipping monitors in Pond Inlet, VHF radio contact information for personnel on the water (channel 26), as well as details for the Baffinland Shipping Facebook account, where daily posts are made. Community members are able to enter the local shipping monitor office in Pond Inlet, where the "Shipping and Marine Monitoring Summary - 2022 Shipping Season" is posted. The first and second floors of the MHTO building is also a message board related to Baffinland which includes latest updates on shipping season including the shipping brochure, and live-vessel viewing is available to community members within this building.
				1.a.5. Has Baffinland made efforts to identify other ways of communicating changes to community members?	x			Yes	Yes	Done	Sustainability Specialist / Manager Community Resource Services	2021 SOP version "BAF-PH1-820-PRO-0001 r0 - Internal Communications Protocol for Shipping Activities" was developed based on previous draft "07132020_BIM_SOP_Communications Protocol_Shipping" and formally finalized in July 2021 (refer to A-3). Specific details on communications included in Section 4 (starts on page 7 of pdf).  Refer to Section 4.2 in the 2022 Marine Shipping and Vessel Management Report (B-18) for summary of correspondence attempts.  Refer to 2021 MHTO End of Shipping, 2022 Start of Shipping Meeting) for slides shared with MHTO (A-4).  Refer to details pertaining to July 13 radio show in Section 4.2 of the 2022 Marine Shipping and Vessel Management Report (refer to B-18).  Daily updates through marine VHF radio, Facebook posts available here: <a href="https://www.facebook.com/baffinlandshipping.7">https://www.facebook.com/baffinlandshipping.7</a>  See rolling schedule email sent to hamlet and MHTO (bilingual); see A-5 examples (showing continuation into 2022 shipping season)	Interviewed Sustainability Specialist - The "Communications Protocol" document is considered a live document as new methods are piloted (e.g. new as of July 2020 Baffinland has a dedicated Facebook Baffinland Shipping Page and Facebook group to facilitate communication to the community) Manager, Community Resource Services (Sept 2021). In 2021, a formal Internal Protocol was developed based on initial drafts and subsequently formally finalized to operationalize internal procedures related to shipping-related communications. A-4 version finalized in July 2021.  Sustainability specialist/Manager, Community Resource Services (Sept 2022). Baffinland actively seeks feedback on its approach to its communications including through MEWG meetings, email correspondence. Although there were failed attempts at scheduling formal pre-shipment season and end of season shipping season meetings with the MHTO, Baffinland held a public radio show. Communications are summarized yearly in the NIRB Marine Shipping and Vessel Management Report which is distributed to numerous parties for comment.
				1.b.1. Has an "end of shipping season" verification meeting taken place at Pond Inlet before Nov 1st with community members?			x	Yes	Yes	Done	Sustainability Specialist / Manager Community Resource Services	Feb 2022. An End of 2021 Shipping season meeting could not be scheduled by Nov 1, 2021 as the shipping season only ended on October 31, 2021.  Formal (see AX-2) and informal requests made to schedule an End of Shipping Season meeting (see AX-2 "11222021_End 2021 Shipping Season Letter" sent to MHTO and Hamlet)  An in-person 2021 end of shipping season meeting has not been held to date. Numerous attempts were made by Baffinland to meet in person with the MHTO, which are outlined in section 4.2 of the 2022 NIRB Marine Shipping and Vessel Management Report (refer to B-18).  The initial formal request to schedule an End of Shipping Season meeting was sent to MHTO and Hamlet on November 22nd, 2021 (refer to AX-2).  Refer to Section 4.2 in the 2022 Marine Shipping and Vessel Management Report (B-18) for summary of correspondence attempts.  Refer to 2021 MHTO End of Shipping, 2022 Start of Shipping Meeting) for slides shared with MHTO (A-4).  Refer to details pertaining to July 13 radio show in Section 4.2 of the 2022 Marine Shipping and Vessel Management Report (refer to B-18).	Manager, Community Resource Services (Feb 2022). Baffinland's shipping season ended on October 31, 2021 when all vessels had exited the Regional Study Area. Although Baffinland strives to hold the End of 2021 End of Shipping Season Meeting as soon as it is feasible to do so after the closing of each shipping season, as of Feb 26, 2022, the Company has not yet scheduled a meeting nor confirmed potential dates over which this meeting may be held with representatives of the Mtitimalk Hunters and Trappers Organization (MHTO) and the Hamlet of Pond Inlet (the Hamlet).  Baffinland made several informal and formal (See document AX-2) requests between October 27, 2021 and November 29, 2021 through verbal and written methods to obtain potential availabilities of the MHTO board members, as well as to obtain input on agenda items to include. Baffinland recognizes that the last few months had been busy for the MHTO given the Phase 2 Hearing/Community Roundtable sessions, the MHTO board elections, and the recent submission of Phase 2 Intervenor closing statements in November 2021, December 2021 and January 2022, respectively. Nunavut has also had to address rising COVID-19 case numbers which have led to numerous restrictions on social gatherings, further limiting the potential to hold in-person gatherings. As COVID-19 restrictions are reduced, Baffinland intends to re-engage with the MHTO and the Hamlet to find mutually agreeable dates on which to hold the End of 2021 Shipping Season meeting in early 2022. As part of planning for this meeting, Baffinland notes that the new MHTO chairperson and board members elected in December 2021 should be sworn in sometime in January 2022. Baffinland currently awaits confirmation from the MHTO on when this will occur so that their input may be provided on their availability and agenda items.  Sustainability specialist/Manager, Community Resource Services (Sept 2022). As of end of June 2022, none of the attempts to schedule an End of 2021 Shipping Season meeting with the MHTO were successful. Slides were ultimately sent to the MHTO for their review with opportunity for follow-up with BIM as needed. A public radio show was also held on July 13th, 2022 in Pond Inlet to provide information to community on past and upcoming shipping seasons and to obtain feedback.
1.b.2. Was the effectiveness of shipping-related commitment discussed?			x	Yes	Yes	Done	Manager Community Resource Services	Not yet applicable to the 2022 shipping season as the shipping season has not yet started.  Refer to B-18 section 4.2 to summarizing numerous attempts for holding mtg.  Alternative discussions through various MEWG meetings - Refer to A-7, 14-Jun-2022 MEWG Meeting Minutes. Refer also to slides 4-13 in A-21. Refer to A-8 and A-9 for the June 22nd and June 29th meeting minutes, respectively.  Details pertaining to public radio show can be found in Section 4.2 of the 2022 Marine Shipping and Vessel Management Report (refer to B-18). Only two questions were received and no concerns were voiced.  Refer to A-4 2021 MHTO End of Shipping, 2022 Start of Shipping Meeting) for slides shared with MHTO as alternative to mtg.	Sustainability specialist/Manager, Community Resource Services (Sept 2022). Shipping activities were discussed through alternative Marine and Environment Working Group (MEWG) meetings. Three MHTO members attended the Marine Environment Working Group (MEWG) meeting held on June 14th, 2022. This meeting provided a shipping summary for the 2022 season, an overview for 2022 marine monitoring programs, and also outlined new commitments and mitigation measures. No modification requests were made by MHTO  Additional meetings were held with the MEWG on June 22nd and June 29th to allow for questions. Over 6 hours was allotted for questions related to suggested improvements at the Project and limited feedback was given from the MHTO.  A radio show was also held on July 13th, 2022 in Pond Inlet to provide information to community on past and upcoming shipping seasons and to obtain feedback.  Powerpoint slides were also shared with MHTO on July 7, 2022, as an in-person meeting was declined				

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					Yes	No	Non-applicable						
				1.b.3. Did the discussion include the need for improvements and/or revisions to the shipping management systems?			x	Yes	Yes	Done	Manager Community Resource Services  Not yet applicable to the 2022 as the shipping season has not yet started.  2021 meeting was never held following numerous failed attempts (refer to B-18 section 4.2).  Alternative discussions through various MEWG meetings - Refer to A-7, 14-Jun-2022 MEWG Meeting Minutes. Refer also to slides 4-13 in A-21 Refer to A-8 and A-9 for the June 22nd and June 29th meeting minutes, respectively.  Details pertaining to public radio show can be found in Section 4.2 of the 2022 Marine Shipping and Vessel Management Report (refer to B-18). Only two questions were received and no concerns were voiced.  Refer to A-4 2021 MHTO End of Shipping: 2022 Start of Shipping Meeting for slides shared with MHTO as alternative to mtg.	Sustainability specialist/Manager, Community Resource Services (Sept 2022): Shipping activities were discussed through alternative Marine and Environment Working Group (MEWG) meetings. Three MHTO members attended the Marine Environment Working Group (MEWG) meeting held on June 14th, 2022. This meeting provided a shipping summary for the 2022 season, an overview for 2022 marine monitoring programs, and also outlined new commitments and mitigation measures. No modification requests were made by MHTO.  Additional meetings were held with the MEWG on June 22nd and June 29th to allow for questions. Over 8 hours was allotted for questions related to suggested improvements at the Project and limited feedback was given from the MHTO.  A radio show was also held on July 13th, 2022 in Pond Inlet to provide information to community on past and upcoming shipping seasons and to obtain feedback.  Powerpoint slides were also shared with MHTO on July 7, 2022, as an in-person meeting could not be scheduled. No feedback provided following exchange of this information.	
				1.c.1. Has the 'start of shipping season meeting been held at Pond Inlet before April 1st?		x		Yes	Yes	Done	Sustainability Specialist / Manager Community Resource Services  Refer to anticipated 2022 communications as presented in "A-7, 14-Jun-2022 MEWG Meeting Minutes" (page 6 of pdf) during MEWG meeting held on June 14, 2022 (See slides 14-16 in A-21). Refer also to A-8 and A-9 for the June 22nd and June 29th meeting minutes, respectively.  Refer to slide 10 for 2021 communications summary in deck provided to MHTO on July 7 2022 (A-4 2021 MHTO End of Shipping: 2022 Start of Shipping Meeting) and slides 27-32 for Communications Protocol summary for 2022 season.  Refer to details pertaining to July 13, 2022 radio show. In Section 4.2 of the 2022 Marine Shipping and Vessel Management Report (refer to B-18).	Sustainability specialist/Manager, Community Resource Services (Sept 2022):  Meeting was not held before April 1, 2022 however many communications were sent out to the MHTO/Hamlet in order to schedule a meeting. These are outlined in section 4.2 of the 2022 NIRS Marine Shipping and Vessel Management Report (refer to B-18). Refer to A-23 for one of several email communications requesting a start of shipping season meeting.  Additional meetings were held with the MEWG on June 22nd and June 29th to allow for questions. Over 8 hours was allotted for questions related to suggested improvements at the Project and limited feedback was given from the MHTO.  A radio show was also held on July 13th, 2022 in Pond Inlet to provide information to community on past and upcoming shipping seasons and to obtain feedback. Only two questions were received and no concerns were voiced.  Powerpoint slides were shared with MHTO on July 7, 2022, as an in-person meeting was declined (refer to A-4 2021 MHTO End of Shipping: 2022 Start of Shipping Meeting) slides. No comments were received.	
		1.c. "Start of shipping season" meeting shall be held in Pond Inlet, not later than April 1, to present the shipping management system including any changes made in response to community input.		1.c.2. Was the shipping management system presented at this meeting?	x			Yes	Yes	Done	Manager Community Resource Services  Refer to A-7, 14-Jun-2022 MEWG Meeting Minutes for discussion of 2022 shipping season. Refer to A-8 and A-9 for the June 22nd and June 29th meeting minutes, respectively.  Details pertaining to this radio show can be found in Section 4.2 of the 2022 Marine Shipping and Vessel Management Report (refer to B-18).  Refer to A-4 2021 MHTO End of Shipping: 2022 Start of Shipping Meeting) slides for information exchanged with MHTO in July 2022	Sustainability specialist/Manager, Community Resource Services (Sept 2022):  No formal 2022 Shipping season meeting was held though despite numerous attempts. Alternative meeting formats were made available to discuss the shipping season through various MEWG meetings that the MHTO attended. Information exchanged via email.  Three MHTO members attended the Marine Environment Working Group (MEWG) meeting held on June 14th, 2022. This meeting provided a shipping summary for the 2022 season, an overview for 2022 marine monitoring programs, and also outlined new commitments and mitigation measures. No modification requests were made by MHTO (refer to A-7, 14-Jun-2022 MEWG Meeting Minutes).  Additional meetings were held with the MEWG on June 22nd and June 29th to allow for questions. Over 8 hours was allotted for questions related to suggested improvements at the Project and limited feedback was given from the MHTO. Refer to A-8 and A-9 for the June 22nd and June 29th meeting minutes, respectively.  A radio show was also held on July 13th, 2022 in Pond Inlet to provide information to community on past and upcoming shipping seasons and to obtain feedback. Only two questions were received and no concerns were voiced.  Powerpoint slides were shared with MHTO on July 7, 2022, as an in-person meeting was declined (refer to A-4 2021 MHTO End of Shipping: 2022 Start of Shipping Meeting) slides. No comments were received.	

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					Yes	No	Non-applicable						
				1.c.3. Were changes in the shipping management system made in response to community input presented separately?	x			Yes	Yes	Done	Sustainability Specialist / Manager Community Resource Services	2021 SOP version "BAF-PH1-820-PRO-0001 r0 - Internal Communications Protocol for Shipping Activities" was developed based on previous draft." 07132020_BIM_SOP_Communications Protocol_Shipping" and formally finalized in July 2021. (refer to A-3) Specific details on communications included in Section 4 (starts on page 7 of pdf). Refer to A.7, A.8, and A.9, respectively summarizing exchanges with MEWG where MHTO was present. Changes are outlined in Table 4.2 Summary of Engagement Outcomes and Table 5.1 2022 Mitigation Measures for Marine Mammals in the 2022 NRB Marine Shipping and Vessel Management Report (refer to B-18). See page 3 in A-1, Shipping and Marine Monitoring Summary - 2022.	Sustainability specialist/Manager, Community Resource Services (Sept 2022): While no formal start of shipping season meeting was held for 2022, Baffinland implemented various mitigation measures based on community recommendations received throughout 2021 and 2022. Changes to the shipping management system include a commitment to reducing vessel transits by 15 per cent, allowing no more than 80 ore carriers to enter the ISA if approved to ship 6 mtpa; continued commitment to avoid ice-breaking at the start of the shipping season; continued commitment to avoid shipping until there is a continuous path of less than 3/10ths ice concentrations; and the continued commitment to limit vessel speeds to 9 nmh. These mitigation measures were discussed at the June 14th, June 23rd, and June 29th MEWG meetings. These presentation slides were also forwarded to the MHTO on June 7th and June 29th, 2022.
2	Shipping	SCS - Provision of vessel-specific communications to the community of Pond Inlet is outstanding.	2. A vessel-specific communication system should be described in plain-language format. Documents must be translated and circulated to all parties.	2.1. Has a vessel-specific communication system been established and maintained?	x			Yes	Yes	Done	Manager Community Resource Services	2021 SOP version "BAF-PH1-820-PRO-0001 r0 - Internal Communications Protocol for Shipping Activities" was developed based on previous draft." 07132020_BIM_SOP_Communications Protocol_Shipping" and formally finalized in July 2021. (refer to A-3) Specific details on communications included in Section 4 (starts on page 7 of pdf). Refer to "Communications" Section, page 7, in "Shipping and Marine Monitoring Summary - 2022 Shipping Season" (refer to A-1). This summary, and additional information pertaining to 2022 shipping communications can be found at: <a href="https://www.baffinland.com/operation/shipping-and-monitoring/">https://www.baffinland.com/operation/shipping-and-monitoring/</a> This summary includes contact information for community-based Baffinland shipping monitors in Pond Inlet, VHF radio contact information for personnel on the water (channel 24). Refer to A.4, End of 2021 Shipping Season Meeting/2022 Planning for Powerpoint slides shared with MHTO on July 7, 2022.	Manager, Community Resource Services(Sept 2021); Baffinland updated its internal communications protocol and finalized the version in July 2021. Details were shared as part of pre-shipment season meeting held in May 28, 2021. Sustainability specialist/Manager, Community Resource Services (Sept 2022): Communications are discussed annually at the end of season and pre-season shipping meetings. SOP developed in 2021 remains the most recent version. Summary of communications and approach submitted to the NRB annually. Full time and part time shipping monitors are hired annually.
				2.2. Has the system been described in a plain-language format and translated as appropriate?	x			Yes	Yes	Done	Manager Community Resource Services	Refer to "Communications" Section, page 7, in "Shipping and Marine Monitoring Summary - 2022 Shipping Season" (refer to A-1). This summary, and additional information pertaining to 2022 shipping communications can be found at: <a href="https://www.baffinland.com/operation/shipping-and-monitoring/">https://www.baffinland.com/operation/shipping-and-monitoring/</a>	Manager, Community Resource Services(Sept 2021); Baffinland updated its internal communications protocol and finalized the version in July 2021. Details are shared as part of pre-shipment season meeting held in May 28, 2021. Fact sheets are created annually and shared with the community in both English and Inuktitut. Sustainability specialist/Manager, Community Resource Services (Sept 2022): Similar approach maintained for 2022 shipping season.
				2.3. Was the system description circulated to all parties?	x			Yes	Yes	Done	Sustainability Specialist / Manager Community Resource Services	Refer to "Communications" Section, page 7, in "Shipping and Marine Monitoring Summary - 2022 Shipping Season" (refer to A-1). This summary, and additional information pertaining to 2022 shipping communications can be found at: <a href="https://www.baffinland.com/operation/shipping-and-monitoring/">https://www.baffinland.com/operation/shipping-and-monitoring/</a> Refer to A-38 for the presentation materials related to 2022 shipping. Refer to details pertaining to July 13, 2022 radio show in Section 4.2 of the 2022 Marine Shipping and Vessel Management Report (refer to B-18).	Interviewed Sustainability Specialist - This document and others were printed and circulated to hamlets and MHTO, as well as left in local offices for public pick-up. Copies are also available at local Baffinland liaison offices and Baffinland's northern headquarters. Manager, Community Resource Services(Sept 2021); this practice continues on a yearly basis in advance of start of shipping season, in consideration of latest COVID-19 guidelines. Manager, Community Resource Services(Feb 2022); Baffinland continues to inform community using a variety of methods, including rolling schedules, social media (Facebook page), etc. Sustainability specialist/Manager, Community Resource Services (Sept 2022); Baffinland continues to inform community using a variety of methods (online versions and hard copies of shipping and monitoring summary brochure (previously known as "fact sheets). This is shared as part of annual communications to community. Additionally, communication systems were outlined in the June 14th MEWG presentation, which three MHTO members attended. These presentation slides were forwarded to the MHTO and Baffinland's Community Liaison Officer on June 7th and June 29th, 2022 for distribution within Pond Inlet. Public radio show completed on July 13, 2022.

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3	Shipping	SCS - The use of VHF Towers/VHF communication systems by the project remains unclear.	3. Work with Baffinland to determine whether adequate repeater towers exist to cover the areas used by hunters and trappers. help to develop a protocol to ensure information relevant to vessel traffic, etc., are effectively communicated to hunters and/or trappers in English and Inuktitut.	3.1. Has Baffinland/QIA determined whether adequate repeater towers exist to cover the areas used by hunters and trappers?	x			Yes	Yes	Done	Sustainability Specialist / Manager Community Resource Services	Refer to A-28 email communication - Bruce Head VHF Radio Repeater Station Installation Complete)  Interviewed Sustainability Specialist - There was a request by hunters for Baffinland to install additional relay stations along the shipping route to improve VHF spatial coverage. Specifically, the Bruce Head area where communications via Marine VHF radio ch. 26 are poor along the shipping route was identified. It remains Baffinland's intent to pursue installation with the MHTO, however this will need to be driven by the MHTO given land access. The additional relay stations have been ordered and are planning to be installed before the start of the 2021 shipping season to address this. Therefore, the Audit Question is not fulfilled as at June 30, 2020 as adequate repeater towers do not currently exist to cover the area used by hunters and trappers.  Manager, Community Resource Services(Sept 2021): Baffinland provided an update on path forward in May 28, 2021 meeting. Since start of 2021, Baffinland has been working towards the planning the installation in summer 2021. Plans were discussed this as part of the May 28, 2021 mtg. This was captured in meeting minutes, through help of radio communication consultant, all equipment was ordered for delivery to Baffinland's Valleyfield Port to be shipped on a scullift to Milne Port. As of June 30,2021, all plans were being coordinated to ensure installation sometime in summer 2021, following receipt of goods and latest COVID-19 related guidance.  Manager, Community Resource Services (Feb 2022): Bruce Head marine VHF Station Installation was completed on Aug 20, 2021 and reported back to MHTO, and Hamlet reps (refer to AX-3).  Sustainability specialist/Manager, Community Resource Services (Sept 2022): Baffinland confirmed completion of installation of Bruce Head via email to MHTO and Hamlet reps	
				3.2. Has a protocol been developed to ensure information relevant to vessel traffic are communicated to hunters and/or trappers?	x			Yes	Yes	Done	Sustainability Specialist / Manager Community Resource Services	2021 SOP version "BAF-PH1-420-FRO-0001-0 - Internal Communications Protocol for Shipping Activities" was developed based on previous draft." (07132020_BIM_SOP_Communications Protocol_Shipping" and formally finalized in July 2021. (refer to A-3)  refer to A-5 for the 2022 Rolling Shipping Schedule.  Refer to "Communications" Section, page 7, in "A1_Shipping and Marine Monitoring Summary - 2022 Shipping Season" (refer to A-1a). This summary, all vessel locations, and additional information pertaining to 2022 shipping communications can be found at: <a href="https://www.baffinland.com/operation/shipping-and-monitoring/">https://www.baffinland.com/operation/shipping-and-monitoring/</a>  The above link includes contact information for community-based Baffinland shipping monitors in Pond Inlet, VHF radio contact information for personnel on the water (channel 26), 24-hour live vessel locations, as well as details for the Baffinland Shipping Facebook account, where daily posts are made.  Details pertaining to this radio show can be found in Section 4.2 of the 2022 Marine Shipping and Vessel Management Report (refer to B-18).	Feb 2022: BIM continues to inform residents of Pond Inlet including hunters of its shipping activities using a variety of methods and in keeping with its communications protocol developed for the 2021 shipping season. (refer to A-4 for 2021-specific information). Rolling schedules have also been shared directly with MHTO and Hamlet reps. Baffinland website maintained to provide 24 hour coverage, and Facebook continues to be used as one of the many methods for informing the community about vessel schedules. Marine VHF radio also used.  Sustainability specialist/Manager, Community Resource Services (Sept 2022):  Approach remains similar to previous years. Also regularly through introduction of 10-vessel line-up email sent to hamlet and MHTO (bilingual). The most recent email communication was sent August 22nd, 2022, which included a tentative schedule up until September 2nd outlining estimated times at berth and estimated times of departure for each proposed vessel.  A radio show was also held on July 13th, 2022 in Pond Inlet to provide information to community on past and upcoming shipping seasons and to obtain feedback.
				3.3. Is the relevant information being communicated in English and Inuktitut?	x			Yes	Yes	Done	Sustainability Specialist / Manager Community Resource Services	Refer to "Communications" Section, page 7, in "Shipping and Marine Monitoring Summary - 2022 Shipping Season" (refer to A-1a). This summary, and additional information pertaining to 2022 shipping communications can be found at: <a href="https://www.baffinland.com/operation/shipping-and-monitoring/">https://www.baffinland.com/operation/shipping-and-monitoring/</a>  Refer to A-1b for the Inuktitut Shipping and Marine Monitoring Summary.  Additionally, communication systems were outlined in the June 14th MEWG presentation, which three MHTO members attended. These presentation slides were forwarded to the MHTO and Baffinland's Community Liaison Officer on June 7th and June 29th, 2022 for distribution within Pond Inlet. Refer to B-9 for the presentation materials related to 2022 SBO Monitoring program (see slides 21 and 22 of slide deck "MEWG 14 June 2022_FINAL"	Interviewed Sustainability Specialist (as part of December 2019 report) - Pond Inlet shipping monitors do announcements in both English and Inuktitut to ensure accessibility for all hunters, including unilingual residents of Pond.  Manager, Community Resource Services(Feb 2022): multiple methods continue to be used and include English and Inuktitut.  Sustainability specialist/Manager, Community Resource Services (Sept 2022): Shipping monitors continue to be hired and are fluent in Inuktitut and English, vessels positions are noted on marine VHF radio

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4	Shipping	SCS - On-Board Monitors as a component of 2018 and future monitoring is unclear.	4. An agreement upon how Baffinland shipboard monitors will be used, including the hiring and training process for these roles.  Confirmation from Baffinland that this program will not be eliminated without a commitment to utilize an alternative form of monitoring.	4.1. Has an agreement been reached regarding how shipboard monitors will be used?	x			Yes	Yes	Done	Sustainability Specialist / Manager Community Resource Services	Baffinland implemented an incidental marine mammal observation program through Marine Mammal Observation Network in 2021 (first year was in 2020). See Figure showing results from 2021. A total of eleven (11) vessels participated in the 2021 MMON pilot program (see table). Table created for inclusion in 2021 NIRB Annual Report, which will be submitted March 31 2022. (B-4). Refer to B-9 for the presentation materials related to 2022 SBO Monitoring program (see slides 21 and 22 of slide deck "MEWEG 14June2022_FINAL"	Interviewed Sustainability Specialist - The program previously outlined in the 2018 Ship-Based Observer Program has not changed in 2019. The methods for the program will be repeated year-over-year with minor modifications to data collection protocols.  2019 program was implemented as done in 2018. Results available in 2019 NIRB Annual Report.  *Note that the SBO program will not be implemented in 2020 due to the COVID-19 pandemic and strict vessel boarding practices that limited boarding to crew only. As an alternative, Baffinland explored alternative methods to pilot and eventually signed an agreement with the Marine Mammal Observation Network to collect incidental marine mammal information through crews of the MSV Botnica, Nordic Bulk Carriers and Desgagnes Transarctic.  Manager, Community Resource Services (Sept 2021): SBO was again not run in 2021 due to boarding restrictions related to the COVID-19 pandemic. Baffinland is continuing its collaboration with the Marine Observation Network, crews of the MSV Botnica, Nordic Bulk Carriers, and Olgendorf (new) have all agreed to support this initiative. Desgagnes Transarctic continues to provide data directly to MMON through its direct partnership.  Sustainability specialist/Manager, Community Resource Services (Sept 2022): SBO program is planned for end of 2022 shipping season. The SBO program will run for two weeks towards the end of the shipping season in 2022. There will be a total of five shipboard monitors, whose roles and responsibilities are outlined in the internal scope of work and work plan. These duties will correspond with previous years i.e. 2019, which are outlined in section 4 of the 2019 NIRB Annual Report (refer to A-30). Baffinland will continue to run the incidental marine mammal sighting program through MMON in 2022.
				4.2. Has a hiring and training process for these roles been established?	x			Yes	Yes	Done	Sustainability Specialist	Refer to C-2 - "Ship-Based Observer Training Manual" - Appendix A 'SBO Training Manual' (Page 76). Refer to B-9 for the presentation materials related to 2022 SBO Monitoring program (see slides 21 and 22 of slide deck "MEWEG 14June2022_FINAL"	Interviewed Sustainability Specialist - Candidates considered through the hiring process for these roles are local Inuit and are widely familiar with all marine wildlife in the area. Local hiring was done in 2019, not possible for 2020/2021 due to COVID-19 pandemic.  Sustainability specialist/Manager, Community Resource Services (Sept 2022): Training for shipboard monitors will be consistent with 2019. All SBOs undergo internal training with WSP Golder, and must complete their marine standard for training, certification, and watchkeeping (STCW) certificates prior to participating in the program. A minimum of two Inuit monitors will be hired for the 2022 season, with a total of 5 participants in the program.
				4.3. If this monitoring system is not being used, has an alternative form of monitoring been committed, planned or implemented?	x			Yes			Yes	Yes	Done

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5	Shipping	SCS - Adherence to shipping routes, anchorage sites and speed limits.	S.a. A map shall be produced, which clearly portrays the shipping route and anchorage sites. The map should clearly display alternative shipping routes and anchorage locations. The map should clearly display "no-go" areas for project vessels.	S.a.1. Has a map been produced which clearly portrays the shipping route and anchorage sites?	x			Yes	Yes	Done	Manager Community Resource Services	See page 4 in A-1a. Shipping and Marine Monitoring Summary - 2022. This summary, and additional information pertaining to 2022 shipping communications can be found at: <a href="https://www.baffinland.com/operations/shipping-and-monitoring/">https://www.baffinland.com/operations/shipping-and-monitoring/</a> Refer to page 22 in the 2022 NIRB Marine Shipping and Vessel Management Report (B-18). Refer to page 10 of B-16 for the shipping route, and page 11 of B-16 for anchorage locations-2022 Standing Instructions and General Information for Masters of Vessels Loading at Milne Inlet Port (SITM) Refer to slide 3 of A-38 - 2022 BIM Shipping Update, which was shared with the Marine Environment Working Group on June 14th, 2022.	Manager, Community Resource Services (Sept 2021): In 2021, maps continue to be included in Shipping Fact Sheet, and also shared as part of meeting with MHTO/Hanlet. Manager, Community Resource Services (Feb 2022): Shipping Instructions to Masters (SITMs: see A-8) updated yearly and includes specific instructions on shipping route, no-go zones, speed limits, anchorage locations, etc. Sustainability specialist/Manager, Community Resource Services (Sept 2022): Similar maps continue to be included in shipping communications and internal guidance documents to vessel captains (E.g., Shipping Instructions to Masters).
				S.a.2. Does the map clearly display alternative shipping routes and anchorage locations?	x			Yes	Yes	Done	Sustainability Specialist	Refer to Section 3 (page 11 of pdf) in the 2022 NIRB Marine Shipping and Vessel Management Report (B-18). Refer to B-16 2022 Standing Instructions and General Information for Masters of Vessels Loading at Milne Inlet Port (SITM) As per PC Condition No. 105, the identification of alternative shipping routes through Hudson Strait is not applicable for the current phase of the Project. Refer to page 2419 in the 2021 NIRB Annual Report (B-4).	Sustainability specialist/Manager, Community Resource Services (Sept 2022): Anchorage locations are discussed as part of annual shipping-related reporting to the NIRB.
				S.a.3. Does the map clearly display "no-go" areas for project vessels?	x			Yes	Yes	Done	Manager Community Resource Services	See page 4 in A-1a. Shipping and Marine Monitoring Summary - 2022. Refer to Figure 5.2 in the Convoy System Operational Guide, Appendix 1 and Figure 5.1 Nominal Shipping Route and Restricted Shipping Areas in the 2022 NIRB Marine Shipping and Vessel Management Report (B-18). Refer to page 10 of B-16 for the shipping route, and page 11 of B-16 for anchorage locations-2022 Standing Instructions and General Information for Masters of Vessels Loading at Milne Inlet Port (SITM) Refer to slide 3 of A-38 - 2022 BIM Shipping Update, which was shared with the Marine Environment Working Group on June 14th, 2022.	Sustainability specialist/Manager, Community Resource Services (Sept 2022): No-go areas continue to be identified in maps throughout various documents (external and internal)
				S.b.1. Have speed limits for project vessels been clearly established?	x			Yes	Yes	Done	Manager Community Resource Services	Refer to section 6.2 of the 2022 Shipping and Marine Wildlife Management Plan, which is appended to the 2022 NIRB Marine Shipping and Vessel Management Report (B-18). Vessel speeds are also outlined on Page 1, Appendix A, of the Production Increase Proposal Renewal Application, which is appended to the 2022 NIRB Marine Shipping and Vessel Management Report (B-18) (starts on PDF pg. 203). Refer to slide 8 of A-38 2022 BIM Shipping Update. Refer to page 13 of the 2022 Standing Instructions and General Information for Masters of Vessels Loading at Milne Inlet Port (SITM), B-16.	Sustainability specialist/Manager, Community Resource Services (Sept 2022): Vessels are informed by Port Captain via email to Vessel Master prior to being called to Milne Port and when exiting Milne Port of key mitigation measures to be enforced including vessel speeds, shipping lane, marine wildlife considerations. Vessel speeds are monitored by community-based shipping monitors in Pond Inlet using ExactEarth software. Vessel speeds for maximum of 9 knots remains current practiced that is actively managed and monitored through various methods (shipping monitors, vessel location software)
			S.b. Speed limits for project vessels shall be clearly established. Shipping routes, anchorage sites, and speed limits shall be communicated to all vessel operators and included in contracting terms for all vessels.	S.b.2. Have shipping routes, anchorage sites, and speed limits been communicated to all vessel operators?	x			Yes	Yes	Done	Sustainability Specialist / Manager Community Resource Services	"Standing Instructions and General Information For Masters of Vessels Sailing to Milne Inlet Port" document, "Navigation" section 2 (Page 9- 15), see A-8 Refer to page 10 of B-16 for the shipping route, and page 11 of B-16 for anchorage locations-2022 Standing Instructions and General Information for Masters of Vessels Loading at Milne Inlet Port (SITM) Refer to page 13 of the 2022 Standing Instructions and General Information for Masters of Vessels Loading at Milne Inlet Port (SITM), B-16	Interviewed Sustainability Specialist - "Standing Instructions and General Information For Masters of Vessels Sailing to Milne Inlet Port" document is provided to all shipping vessel owner/operators as well as shipping captains. Manager, Community Resource Services (Sept 2021): The Port Captain continues to manage entry and departure into the Regional Study Area of all vessels contracted to Baffinland via email, emphasizing vessel speed restrictions, shipping lane waypoints, etc. Sustainability specialist/Manager, Community Resource Services (Sept 2022): Vessels are also informed by Port Captain via email to Vessel Master prior to being called to Milne Port and when exiting Milne Port of key mitigation measures to be enforced including vessel speeds, shipping lane, marine wildlife considerations. Vessel speeds are monitored by community-based shipping monitors in Pond Inlet using ExactEarth software. Vessel speeds for maximum of 9 knots remains current practiced that is actively managed and monitored through various methods (shipping monitors, vessel location software)

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				5.b.3. Have details regarding shipping routes, anchorage sites, and speed limits been included in contracting terms for all vessels?	x			Yes	Yes	Done	Sustainability Specialist	Refer to Section 2, p. 9-13, of the 2022 Standing Instructions and General Information for Masters of Vessels Loading at Milne Inlet Port (SITM), B-16. These instructions are provided to all shipping vessel owners/operators, as well as captains.	Interviewed Sustainability Specialist - "Standing Instructions and General Information For Masters of Vessels Sailing to Milne Inlet Port" document is provided to all shipping vessel owner/operators as well as shipping captains.  Sustainability specialist/Manager, Community Resource Services (Sept 2022):  Vessels are also informed by Port Captain via email to Vessel Master prior to being called to Milne Port and when exiting Milne Port of key mitigation measures to be enforced including vessel speeds, shipping lane, marine wildlife considerations.  Vessel speeds are monitored by community-based shipping monitors in Pond Inlet using ExactEarth software. Vessel speeds for maximum of 9 knots remains current practice that is actively managed and monitored through various methods (shipping monitors, vessel location software)
			5.c. Baffinland shall certify that all vessel owners and operations have been informed of shipping route and anchorage locations and speed limits ("project-specific shipping requirements").	5.c.1. Has Baffinland certified that all vessel owners and operations have been informed of shipping route and anchorage locations and speed limits?	x			Yes	Yes	Done	Sustainability Specialist	Refer to Section 2, p. 9-13, of the 2022 Standing Instructions and General Information for Masters of Vessels Loading at Milne Inlet Port (SITM), B-16. These instructions are provided to all shipping vessel owners/operators, as well as captains.	Interviewed Sustainability Specialist - "Standing Instructions and General Information For Masters of Vessels Sailing to Milne Inlet Port" document is provided to all shipping vessel owner/operators as well as shipping captains.  Sustainability specialist/Manager, Community Resource Services (Sept 2022). Vessels are also informed by Port Captain via email prior to being called to Milne Port and when exiting Milne Port of key mitigation measures to be enforced including vessel speeds, shipping lane, marine wildlife considerations.
			5.d. Baffinland shall confirm how strict compliance with these project-specific shipping requirements will be enforced, including "live" community feedback.	5.d.1. Are these conditions being regularly enforced?	x			Yes	Yes	Done	Sustainability Specialist / Manager Community Resource Services	Live tracker of comments is maintained by shipping monitors and addressed as needed and based on priorities.  ExactEarth tracking software sends alerts any time vessel speeds surpass 9kn, or are outside designated shipping route, if vessels were to enter no-go zones, drifting in Eclipse Sound, allowing for quick follow-up with vessel master.  Follow-ups for enforcement of compliance / explanation from vessel captains is requested known as "deviation report" (see AX-4 "DeviationReport")  "deviation report" is requested for any non-compliance events related to speed or shipping route deviation as triggered by the online tracker system (see A-31, 2021 Deviation Report Example)	Interviewed Sustainability Specialist - AIS system tracks individual ship's speeds, anchorage sites and shipping routes. This system produces notifications when an infraction happens, which are sent to Baffinland, who relays to the Owner/Operator and Captain of the ship. Logs of the infractions are also sent to vessel owner. All results of the tracking and vessel speeds were provided in the 2019 NISB Annual Report.  Manager, Community Resource Services (Sept 2021/Feb 2022). Baffinland continues to use exactEarth software to actively monitor vessel locations. Shipping monitors actively track this information. If a notification is triggered by exactEarth, prompt follow-up includes a message from the Port Captain requesting reasoning for potential non-compliance by Vessel Master. These responses are all tracked. (refer to AX-4) for example of communications.  Sustainability specialist/Manager, Community Resource Services (Sept 2022):  Live tracker of comments is maintained by shipping monitors in Pond Inlet and addressed as needed and based on priorities.  ExactEarth tracking software sends alerts any time vessel speeds surpass 9kn, are outside designated shipping route, enter no-go zones, or drift in Eclipse Sound, allowing for quick follow-up with vessel master.  Follow-ups for enforcement of compliance / explanation from vessel captains is requested known as "deviation report"

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					Yes	No	Non-applicable						
				5.d.2. Is there a mechanism to incorporate community feedback regarding the enforcement of these regulations?	x			Yes	Yes	Done	Sustainability Specialist / Manager Community Resource Services	2020 SOP version "07132020_BIM_SOP_Communications Protocol_Shipping" was modified in 2021 and formally finalized in July 2021 "BAF-PH1-820-PRO-0001 r0 - Internal Communications Protocol for Shipping Activities". Specific details on communications included in Section 4 (starts on page 7 of pdf) (refer to A-3)  Live tracker of comments/questions/concerns maintained by shipping monitors (Refer to A-32 2022 Shipping Tracker)	Interviewed Sustainability Specialist - Community has been made aware of the rules regarding shipping and can register their feedback with Baffinland. The Community is then updated on their feedback at local liaison offices. Baffinland keeps a community feedback log (witnessed log for 2019) which includes Baffinland's response to the feedback. The shipping monitors kept a running log throughout the shipping season of all comments and concerns received, as well as office visitors.  Manager, Community Resource Services (Feb 2022): Live tracker of comments/questions/concerns is maintained by shipping monitors and includes communications from social media, marine VHF, in-office visits. (refer to A-X5 for summary of comments/questions/concerns received during 2021 shipping season)  Sustainability specialist/Manager, Community Resource Services (Sept 2022):  Ongoing tracking of deviations and concerns remains in place for 2022 shipping season
6	Shipping	SCS - Ballast Water management is not well understood.	6.a. Confirmation by Baffinland as to how for ballast water management requirements is being addressed. 6.b. Confirmation by Baffinland as to how ballast water management requirements are being monitored.	6.a. Has Baffinland established a protocol for how ballast water is managed? 6.b. Has Baffinland established a protocol for how ballast water management requirements will be monitored?	x			No	No	Done	Sustainability Specialist	"Ballast Water Management Plan" document, "Ballast Water Management" section 2 (Page 9) (see B-6)  "Ballast Water Management Plan" document, "Monitoring and Controls" section 3 (Page 12) (see B-6)	
7	Shipping	Bruce Head Monitoring as a component of 2018 and future monitoring is unclear.	7. Confirmation from Baffinland as to whether the program will operate in 2019.	7.a. Has the Bruce Head Monitoring program been confirmed for the calendar year?	x			Yes	Yes	Done	Sustainability Specialist / Manager Community Resource Services	Refer to B-9 "2022 Marine Monitoring Studies" presentation, "Bruce Head Shore-based Monitoring Program" section (Slide 19-20) from Aug 14, 2022.  Refer to A-4 2021 MHTO End of Shipping, 2022 Start of Shipping Meeting slides.	Interviewed Sustainability Specialist - Baffinland is moving forward with the Bruce Head Shore-based Monitoring program even in the context of COVID-19.  Manager, Community Resource Services (Sept 2021): program will continue into 2021.  Sustainability specialist/Manager, Community Resource Services (Sept 2022):  2022 Bruce Head Monitoring Program is being planned for (and can confirm implementation in 2022) as presented during MEWG meeting held June 14, 2022. These presentation slides were also forwarded to the MHTO on June 7th and June 29th, 2022.  Documents summarizing 2021 program results were also sent to the MHTO on July 7th, 2022. No specific comments were received from MHTO.
8	Shipping	Wildlife Compensation Fund requires improved public awareness.	8. Provide additional information about the Wildlife Compensation Fund, including how it is administered.	8. Has additional information about the Wildlife Compensation Fund, and its administration, been provided to the appropriate parties?			x	No	No	Done	IIBA Reporting Specialist	N/A	Interviewed IIBA Reporting Specialist (as part of June 2019 report) - This is the responsibility of the OIA, and therefore not Baffinland's responsibility.
9	Shipping	Compensation for damages to equipment as a result of project ships is unclear.	9. Clarify whether compensation for damage to personal equipment as a result of project shipping activities is addressed by Wildlife Compensation Fund.	9.1. Have the terms for compensation under the Wildlife Compensation Fund been established? 9.2. Do these terms cover compensation for damage to personal equipment as a result of project shipping activities?			x	No	No	Done	IIBA Reporting Specialist	N/A	Interviewed IIBA Reporting Specialist (as part of June 2019 report) - This is the responsibility of the OIA, and therefore not Baffinland's responsibility.
10	Shipping	Additional Monitoring Programs are unclear	10. Confirmation as to what other monitoring programs will exist, including but not limited to programs run by Baffinland.	10.1. Have any additional environmental monitoring programs been established or are in planning stages by Baffinland?  10.2. Have any other additional environmental monitoring programmes been established or are in planning stages by other organizations?	x			Yes	Yes	Done	Sustainability Specialist	"2022 Marine Monitoring Studies" presentation (refer to B-9);  "2022 Terrestrial Monitoring Overview, June 23 2022 Presentation to the TEWG", Additional dustfall monitoring stations added (pg. 8) and proposal for caribou aerial surveys (pg. 17-18) (Refer to B-2)	Interviewed Sustainability Specialist - Given the limited open-water season and shipping period, programs are planned in spring, executed in summer and data is analyzed and reported on throughout the winter months. Planning began for all programs with the exception of the SBO due to boarding restrictions associated with COVID-19 pandemic.  New programs added for 2021 were highlighted in presentation to the MEWG and TEWG in June 2021. Supporting documentation has been provided.  Sustainability specialist/Manager, Community Resource Services (Sept 2022):  Numerous terrestrial and marine environment monitoring programs are being planned for 2022 as described during TEWG and MEWG meetings held in June 2022 over numerous dates.
								Yes	Yes	Done	Sustainability Specialist	DFO Killer Whale Tagging Work (Community-run Project) (refer to A-19) GN North Barren Composition Survey (refer to A-11) GN Caribou Health Monitoring (refer to A-13) BIM 2021 Steensby Monitoring Programs (refer to A-22) BIM Pilot Snow Melt Water Assessment (refer to A-41)  Refer to A-34 for presentation materials and B-12 for June 23rd, 2022 TEWG meeting minutes.  Refer to A-9, 29-Jun-2022 MEWG Meeting Minutes for summary of proposed Oceans North studies.	Studies have been submitted by DFO, and a community-based research group called Arctic Connexion.  Sustainability specialist/Manager, Community Resource Services (Sept 2022):  Representatives from Natural Resources Canada (NRCan) presented on their current research at the June 23rd, 2022 Terrestrial Environment Working Group (TEWG) meeting. This research involves fugitive dust mapping using remote sensing, as well as dust monitoring within the mining sector, including: dust monitoring techniques, dust characterization, and the environmental effects of dust. Refer to A-34 for presentation materials and B-12 for June 23rd, 2022 TEWG meeting minutes.  At the June 29th, 2022 Marine Environment Working Group (MEWG) meeting, Oceans North representatives discussed current acoustic monitoring that is being undertaken in the vicinity of the Project area in collaboration with the MHTO. Refer to A-9, 29-Jun-2022 MEWG Meeting Minutes.  ECCC will be resuming its seabird monitoring program on Bylot Island (Baffinland partially funds this work).

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11	Dust	Tote Road Dust Monitoring Results/Tote Road Sampling Locations must adjust to address dust current and anticipated impacts.	11. Confirmation is required from Baffinland on the extent of additional monitoring that will be implemented along the Tote Road to assess the impact of increased project activities associated with the eMtpa application.	11.1. Has a plan for additional monitoring along the Tote Road been established to assess the impact of increased project activities associated with the eMtpa application?	x			Yes	Yes	Done	Environmental and Regulatory Compliance Manager	<p>2020 Final Terrestrial Environment Annual Monitoring Report", section 8.2.1 (Pdf pg. 121) (B-13). Final 2021 Terrestrial Environment Annual Monitoring Report was not released during period of question. Final Report to be released in Q3 of 2022.</p> <p>Refer to slides 8-9 of B-2 for additional information on modifications to the dust monitoring program, which were highlighted at the June 23rd TEWG Meeting.</p> <p>Refer to B-12, June 23rd, 2022 TEWG Meeting Minutes (Draft: currently under review by the TEWG).</p> <p>Refer to p. 8 of the 2021 NIRB Annual Report (B-4a) for additional information pertaining to air quality monitoring program modifications, including the implementation of a new Dust Audit Committee comprised of representatives from the five North Baffin Communities. The Dust Audit Committee has completed multiple site investigations and will release a Final Audit Report in Q4 of 2022.</p>	<p>Interviewed Environmental and Regulatory Compliance Manager (as part of December 2019 report) - New dust monitoring activities are being implemented in regards to the eMtpa application.</p> <p>Manager, Community Resource Services(March 2022): Expansion of dust monitoring program included new sampling sites in 2019 which continue to be monitored. New to 2020 and 2021 is the use of satellite imagery to monitor dust extent visually. E.g., 2020 Final Terrestrial Environment Annual Monitoring Report (Section 8.2.1, p. 121 of pdf) (A-14)</p> <p>Sustainability specialist/Manager, Community Resource Services (Sept 2022):</p> <p>In late 2021, five new standard stations 1 km distance from Milne Port, four new standard stations along the proposed rail deviation, and six non-standard 0.5 m height stations were installed at the Project in response to MHTO, CIA, and TEWG comments. Additionally, Baffinland expanded its dust monitoring program to include more extensive remote sensing imagery analysis.</p> <p>Additional information pertaining to air quality monitoring program modifications, including the implementation of a new Dust Audit Committee comprised of representatives from the five North Baffin Communities. The Dust Audit Committee has completed multiple site investigations and will release a Final Audit Report in Q4 of 2022.</p>
				11.2. Does this plan for additional monitoring include methodologies, frequencies and reporting of the results?	x			Yes	Yes	Done	Sustainability Specialist	<p>Terrestrial Environment Annual Monitoring Report, "Vegetation Monitoring, Dust Fall" Section 4.3 (p. 82-84), "Dust fall sample locations for the project area" map (pg. 138), "Dust (TSP) Disposition Rates and Criteria for Potential Effects on Vegetation Health" Table 7-2. (refer to B-1)</p> <p>"2022 Terrestrial Monitoring Overview, June 23 2022 Presentation to the TEWG": Additional dustfall monitoring stations added (pg. 8) and proposal for caribou aerial surveys (pg. 17-18) (Refer to B-2)</p> <p>Refer to B-12, June 23rd, 2022 TEWG Meeting Minutes (Draft: currently under review by the TEWG).</p> <p>Refer to p. 8 of the 2021 NIRB Annual Report (B-4a) for additional information pertaining to air quality monitoring program modifications, including the implementation of a new Dust Audit Committee comprised of representatives from the five North Baffin Communities. The Dust Audit Committee has completed multiple site investigations and will release a Final Audit Report in Q4 of 2022.</p>	<p>Interviewed Sustainability Specialist (as part of the December 2019 report) - Methodologies, frequencies and reporting of the results of Dust Fall sampling has been integrated into the Terrestrial Environment Mitigation and Monitoring Plan.</p> <p>Sustainability specialist/Manager, Community Resource Services (Sept 2022):</p> <p>Additional information pertaining to air quality monitoring program modifications, including the implementation of a new Dust Audit Committee comprised of representatives from the five North Baffin Communities. The Dust Audit Committee has completed multiple site investigations and will release a Final Audit Report in Q4 of 2022.</p>
12	Dust	Tote Road Dust Mitigation is required to address current dust impacts.	12. Confirmation is required from Baffinland on measures that will be implemented to effectively manage dust generated along the Tote Road due to current and increased project activities.	12.1. Does Baffinland have measures in place to manage dust generated along the Tote Road due to current and increased project activities?	x			No	No	Done	Environmental and Regulatory Compliance Manager	<p>"Roads Management Plan" document, "Dust Management" section 3.4.6 (Page 17) (refer to A-14)</p>	
				12.2. Has a protocol been established to determine the efficacy of the dust reduction measures?	x			Yes	Yes	Done	Sustainability Specialist / Manager Community Resource Services	<p>2020 Mary River Project Terrestrial Environment Annual Monitoring Report document, "Total Annual Dust Fall" section 8.1.3.2 (Page 84), (refer to B-13).</p> <p>Refer to Table 4.8 Air Quality Impact Evaluation of the 2021 NIRB Annual Report (B-4), which provides a summary of air quality effects, monitoring completed in 2021, and an evaluation of the impacts relative to FEIS predictions.</p>	<p>Interviewed Sustainability Specialist - The draft annual report inclusive of dustfall results was submitted to the members of the Terrestrial Environment Working Group for comment in April 2020 and also as part of the 2019 Annual Report for the Nunavut Impact Review Board in May 2020. Comments were received by the CIA, CN and ECC-CWS on May 15, 2020. The final draft will include comment responses and will be provided as part of comment responses to the NIRB Annual report.</p> <p>Manager, Community Resource Services(March 2022): Draft 2021 Report can be provided showing 2021 results and will be reported as part of 2021 Annual report to the NIRB. Final 2020 report is A-14.</p> <p>Sustainability specialist/Manager, Community Resource Services (Sept 2022):</p> <p>Final 2021 Terrestrial Environment Annual Monitoring Report was not released at time of audit. Final Report to be released in Q3 of 2022.</p> <p>2022 program ongoing based on existing protocols.</p>

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13	Dust	Expanded site monitoring program related to dust, water, land, wildlife, human) is required to address these impacts.	13. Confirmation is required from Baffinland on the extent of additional monitoring that will be carried out to address potential impact of increased project activities on freshwater (in relation to the Tote Road), terrestrial, wildlife and human health components.	13.1. Has Baffinland established additional monitoring programs to measure the potential impacts of the project on freshwater in relation to the Tote Road?	x			No	No	Done	Environmental and Regulatory Compliance Manager	"Roads Management Plan" document, "Document Revision Record" section (Page 2) establishes that additional monitoring programs have been undertaken. 8 (Page 50-56) details the measuring of the potential impact on freshwater. (refer to A-14)	
				13.2. Has Baffinland established additional monitoring programs to measure the potential impacts of the project on terrestrial?	x			Yes	Yes	Done	Sustainability Specialist	Relevant to the Mary River Project's Terrestrial Environment Mitigation and Monitoring Plan Table 1-1. (refer to B-1). "2020 Mary River Project Terrestrial Environment Annual Monitoring Report" document summarizes changes to program components (pages 55-60, 109-113, 145-146, 151-156, 160-163, 182. (refer to B-13). Final 2021 Terrestrial Environment Annual Monitoring Report was not released during period of question. Final Report to be released in Q3 of 2022. "2022 Terrestrial Monitoring Overview: June 23 2022 Presentation to the TEWG": Additional dustfall monitoring stations added (pg. 8) and proposal for caribou aerial surveys (pg. 17-18) (Refer to B-2) Refer to slides 8-9 of B-2 for additional information on modifications to the dust monitoring program, which were highlighted at the June 23rd TEWG Meeting. Refer to B-12: June 23rd, 2022 TEWG Meeting Minutes (Draft - currently under review by the TEWG). Refer to p. 8 of the 2021 NIRB Annual Report (B-4a) for additional information pertaining to air quality monitoring program modifications, including the implementation of a new Dust Audit Committee comprised of representatives from the five North Baffin Communities. The Dust Audit Committee has completed multiple site investigations and will release a Final Audit Report in Q4 of 2022. Additionally, Baffinland implemented a snow sampling program to further enhance dust monitoring. The pilot program was launched in 2020/2021 and the preliminary results are found in A-35.	Interviewed Sustainability Specialist - This has not been formally updated since 2016, however additional sampling stations have been added for dust monitoring, snowbank monitoring methods have been slightly changed based on TEWG input, and frequency of height of land surveys has increased.  Sustainability specialist/Manager, Community Resource Services (Sept 2022).  In late 2021, five new standard dustfall monitoring stations 1 km distance from Milne Port, four new standard stations along the proposed rail deviation, and six non-standard 0.5 m height stations were installed at the Project in response to MHTO, CIA, and TEWG comments. Additionally, Baffinland expanded its dust monitoring program to include more extensive remote sensing imagery analysis. Refer to slides 8-9 of B-2 for additional information on modifications to the dust monitoring program, which were highlighted at the June 23rd TEWG Meeting.  Refer to p. 8 of the 2021 NIRB Annual Report (B-4a) for additional information pertaining to air quality monitoring program modifications, including the implementation of a new Dust Audit Committee comprised of representatives from the five North Baffin Communities. The Dust Audit Committee has completed multiple site investigations and will release a Final Audit Report in Q4 of 2022.  Additionally, Baffinland implemented a snow sampling program to further enhance dust monitoring. The pilot program was launched in 2020/2021 and the preliminary results are found in A-35.
				13.3. Has Baffinland established additional monitoring programs to measure the potential impacts of the project on wildlife?	x			Yes	No	Done	Sustainability Specialist	"Terrestrial Environment Annual Monitoring Report" document, there are several sections throughout this report that address Baffinland's establishment of additional monitoring programs to measure the potential impacts of the project on wildlife. (refer to B-13). Final 2021 Terrestrial Environment Annual Monitoring Report was not released during audit period. Final Report to be released in Q3 of 2022.  "2022 Terrestrial Monitoring Overview: June 23 2022 Presentation to the TEWG": Additional dustfall monitoring stations added (pg. 8) and proposal for caribou aerial surveys (pg. 17-18) (Refer to B-2)  Refer to B-9 "2022 Marine Monitoring Studies" presentation for modifications to the 2022 marine programs, which includes reinstating the SBO program.  Baffinland attempted to launch a narwhal tagging program for the 2022 season, but abandoned the program due to lack of support from the MHTO. Refer to A-8 for the 22-Jun-2022 MEWG meeting minutes, which discuss the lack of support for this proposed program.	Interviewed Sustainability Specialist - This has not been formally updated since 2016, however additional sampling stations have been added for dust monitoring, snowbank monitoring methods have been slightly changed based on TEWG input, and frequency of height of land surveys has increased (see A-24).
				13.4. Has Baffinland established additional monitoring programs to measure the potential impacts of the project on human health?	x			Yes	Yes	Done	Sustainability Specialist	2020 Terrestrial Environment Annual Monitoring Report Section 9.1 "Vegetation and Soil Base Metals Monitoring" (refer to B-13). Final 2021 Terrestrial Environment Annual Monitoring Report was not released during period of question. Final Report to be released in Q3 of 2022.  Refer to section 4.6.6. of the 2021 NIRB Annual Report for additional monitoring of soil-metal concentrations in relation to human health (B-4).  As per PC Conditions 13-15, Refer to section 4.6.3 of the 2021 NIRB Annual Report (B-4) for additional information pertaining to noise and vibration impact evaluation.  Refer to section 4.7.5 Human Health and Wellbeing (PC Conditions 153-157) of the 2021 NIRB Annual Report (B-4) for additional information pertaining to evaluating the impacts of the project on human health, including but not limited to: number of instances that illegal substances or alcohol were identified during security searches, at the Project sites, and occupational health and safety statistics. Baffinland has also presented information on the prevalence of substance abuse, gambling issues, family violence, marital problems, rates of sexually transmitted infections and other communicable diseases, rates of teenage pregnancy, high school completion rates, proportion of tax filers with employment income and median employment income, percentage of population receiving social assistance, and other topics (e.g. crime rates). Table 4.49 provides an evaluation of the Project's impacts on human health and well-being, based on monitoring activities completed in 2021, relative to predictions presented in the FEIS and FEIS Addendum.	Interviewed Sustainability Specialist (as part of December 2019 report) - Monitoring programs are in place to measure the level of contaminants in soil and vegetation, which are uptake pathways that would affect human health through the consumption of country foods. (see A-24).  Sustainability specialist/Manager, Community Resource Services (Sept 2022).  Baffinland continues to monitor noise and vibration in relation to human health twice per annum. Baffinland conducted additional noise monitoring during the summer 2022 season, which corresponds to previous monitoring conducted in 2018 by RWDI consultants.
				14.1. Has Baffinland identified the Project's management plans that require updating?	x			Yes	No	Done		Baffinland developed an Informal, Internal Tracker to address recommended management plan updates proposed by various organizations and working group members (refer to A-36 Management Plan Updates Tracker). This tracker is currently based off of the NIRB response letter to the Phase II proposal.	

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					Yes	No	Non-applicable								
14	Management Plans	Management Plans must be updated.	14. Commitment is required from Baffinland on whether it will be updating its Management Plans to reflect changes in project scope and operational requirements.	14.2. Has Baffinland updated: Air Quality and Noise Abatement Management Plan to support 6 Mtpa Application: Update to reflect revised dust monitoring program and management protocols?	x			Yes	No	Done	Sustainability Specialist	"Air Quality & Noise Abatement Management Plan" document describes those changes regarding dust monitoring. Figure showing new dust collection locations (Page 110), dust monitoring discussed in Section 5.2.1 (Page 32-34), Attachment 6 'Dust Fall Monitoring' (pages 107-110) and Discussed in Attachment 7 'Dust Management Protocol' (pages 112 - 168) (refer to A-15).			
				14.3. Has Baffinland updated: Terrestrial Environment Mitigation and Monitoring Plan to support 6 Mtpa Application: Update to reflect revised dust monitoring program and management protocols?	x			Yes	Yes	Done	Sustainability Specialist	"2020 Mary River Project Terrestrial Environment Annual Monitoring Report" document summarizes changes to program components re dust monitoring. (pages 55-60) (refer to B-13). "Air Quality & Noise Abatement Management Plan" document describes those changes regarding dust monitoring. Figure showing new dust collection locations (Page 110), dust monitoring discussed in Section 5.2.1 (Page 32-34), Attachment 6 'Dust Fall Monitoring' (pages 107-110) and Discussed in Attachment 7 'Dust Management Protocol' (pages 112 - 168) (refer to A-15).	Interviewed Sustainability Specialist - This has not been formally updated since 2016, however additional sampling stations have been added for dust monitoring, snowbank monitoring methods have been slightly changed based on TEWG input, and frequency of height of land surveys has increased. Sustainability specialist/Manager, Community Resource Services (Sept 2022): Final 2021 Terrestrial Environment Annual Monitoring Report was not released during period of question. Final Report to be released in Q3 of 2022.		
				14.4. Has Baffinland updated the "Spill Contingency Plan" to support 6 Mtpa Application: Update to reflect increased fuel capacity at Milne Port (e.g. 15 MI tank)?	x			No			No	Done	Sustainability Specialist	"Spill Contingency Plan" document, "Document Revision Record" section (Page 2) (refer to A-17)	
				14.5. Has Baffinland updated the "Fresh Water, Sewage and Wastewater Management Plan" to support 6 Mtpa Application: Update to include new camp and associated infrastructure at Milne Port, including the new potable water treatment plant and sewage treatment plant?	x			No			No	Done	Environmental and Regulatory Compliance Manager	"Fresh Water Supply, Sewage, and Wastewater Management Plan" document, "Document Revision Record" section (Page 2), "Introduction" section (Page 7), (Page 52) (A-25)	Interviewed Environmental and Regulatory Compliance Manager (as part of June 2019 report) - Milne Port and Salvik are the new camps and these have been included in the updated plans.
				14.6. Has Baffinland updated the "Interim Closure and Reclamation Plan (ICRP)" to support 6 Mtpa Application: Update to include reclamation considerations for additional Project infrastructure proposed?	x			No			No	Done	Environmental and Regulatory Compliance Manager	"Interim Closure and Reclamation Plan" document, "Introduction" section 2 (Page 17) (A-26)	Interviewed Environmental and Regulatory Compliance Manager (as part of June 2019 report) - ICRP considers the complete development of the Mary River Project.
				14.7. Has Baffinland updated the "Waste Management Plan" to support the 6 Mtpa Application: Update to include additional Project infrastructure proposed at Milne Port?	x			No			No	Done	Sustainability Specialist	"Waste Management Plan" document, "Document Revision Record" section (Page 2) & (Page 47) (A-27)	
				14.8. Has Baffinland updated the "Milne Port Oil Pollution Emergency Plan (OPEP)" to support the 6 Mtpa Application: Update to reflect increased fuel capacity at Milne Port (e.g. 15 MI tank)?	x			No			No	Done	Environmental and Regulatory Compliance Manager	"Oil Pollution Emergency Plan - Milne Inlet" document, "Document Revision Record" (Page 2) & "Milne Inlet Fuel Storage Facility" (Page 66, 68) (B-26)	Interviewed Environmental and Regulatory Compliance Manager - OPEP was updated in May 2021.
				14.9. Has Baffinland updated the "Shipping and Marine Wildlife Management Plan" to support 6 Mtpa Application: Update to reflect revised marine wildlife monitoring and adaptive shipping protocols?	x			Yes	Yes	Done	Sustainability Specialist	See Appendix 1 Shipping and Marine Wildlife Management Plan (SMWMP) in B-18 (page 39 of pdf) Adaptive management measures available in Appendix D in Appendix 1 in B-18 (page 106 of PDF)	Additional Adaptive Management measures were introduced in 2021 and are described in Appendix D to the SMWMP (A-18) Sustainability specialist/Manager, Community Resource Services (Sept 2022): Additional Adaptive Management measures were introduced in 2022 and are described in Appendix D to the SMWMP		

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					Yes	No	Non-applicable						
14 (cont'd)	Management Plans (cont'd)	Management Plans must be updated (cont'd)	14. Commitment is required from Baffinland on whether it will be updating its Management Plans to reflect changes in project scope and operational requirements. (cont'd)	14.10. For the above plans, have Project figures also been updated in select Project management plans to reflect the additional infrastructure and changes to Project site layouts, proposed in the 6 Mtpa application?	x			No	No	Done	Environmental and Regulatory Compliance Manager	"Waste Management Plan" document, (Page 47) (A-27) & "Interim Closure and Reclamation Plan" document, Sustainable Development section (page 156) (A-26) & "Fresh Water Supply, Sewage, and Wastewater Management Plan" document, (Page 56 & 58) (A-25)	
15	Water Compensation Agreement (WCA)	Water compensation agreement (WCA) Environmental Information Review has yet to be responded to by Baffinland.	15. Reach agreement between OIA and Baffinland on the "Environmental Information Review"	15. Has Baffinland provided a response regarding the "Environmental Information Review"?	x			No	No	Done	Environmental and Regulatory Compliance Manager	"Response to Oikigiani Inuit Association Assessment of Environmental Information and Substantial Effects" document, section 1-3 (Page 7-26) (A-29)	Interviewed Environmental and Regulatory Compliance Manager (as part of December 2019 report) - Baffinland has submitted to OIA on January 11, 2019.
16	Water Compensation Agreement (WCA)	WCA - Natural Variation and Significant Impacts have yet to be adequately defined.	16. Reach agreement between OIA and Baffinland on the "Natural Variation and Significant Impacts"	16. Has Baffinland provided a response regarding the "Natural Variation and Significant Impacts"?	x			No	No	Done	Environmental and Regulatory Compliance Manager	"Response to Oikigiani Inuit Association Assessment of Environmental Information and Substantial Effects" document, section 1-3 (Page 7-26) (A-29)	Interviewed Environmental and Regulatory Compliance Manager (as part of December 2019 report) - Baffinland has submitted to OIA on January 11, 2019.
17	Water Compensation Agreement (WCA)	WCA - Amendment to WCA is outstanding.	17. Baffinland is required to formally amend the Water Compensation Agreement (WCA) to include the production increase within the scope of this agreement.	17. Has Baffinland provided a response to amend the WCA to include the production increase within the scope of the agreement?			x		No	Done	Environmental and Regulatory Compliance Manager	N/A	Interviewed Environmental and Regulatory Compliance Manager (as part of June 2019 report) - No update to WCA required as a result of production increase.
18	Environmental monitoring Community fund	WCA - An overall WCA Implementation Framework has not been established.	18. Confirmation on when Baffinland intends to provide a framework for implementing the Water Compensation Agreement (WCA).	18. Has Baffinland provided a response to regarding development of a framework to implement the WCA?	x			No	No	Done	Environmental and Regulatory Compliance Manager	"Baffinland Iron Mines Corporation & Oikigiani Inuit Association Water Compensation Agreement - Implementation Guide" document (A-20)	Interviewed Environmental and Regulatory Compliance Manager (as part of December 2019 report) - The Implementation Guide document is still in draft form as it's with OIA for approval (sent to OIA via email on November 9, 2018) - Water Compensation Agreement approved by OIA May 3, 2013.
19	Environmental monitoring Community fund	WCA - It remains unclear how impacts greater than predicted will be managed under this agreement.	19. Confirmation is required from Baffinland on how "greater than predicted" impacts will be address in the context of the Water Compensation Agreement.	19. Has Baffinland provided a response regarding the "greater than predicted" impacts in the context of the WCA?	x			No	No	Done	Environmental and Regulatory Compliance Manager	"Baffinland Iron Mines Corporation & Oikigiani Inuit Association Water Compensation Agreement" document, "Substantial Effects Determination" section 2 (Page 5-7) (A-20)	Interviewed Environmental and Regulatory Compliance Manager (as part of December 2019 report) - The Implementation Guide document is still in draft form as it's with OIA for approval (sent to OIA via email on November 9, 2018) - Water Compensation Agreement approved by OIA May 3, 2013.
20	Communications	IOL Lease - Interim Closure and Reclamation Plan remains a conditional approval.	20. Confirmation is required on when Baffinland will submit an updated ICRP to address OIA's comments and recommendations.	20. Has a timeline been established for Baffinland's submission of an updated ICRP to address OIA's comments and recommendations?	x			No	No	Done	Environmental and Regulatory Compliance Manager	"Interim Closure Reclamation Plan Version 5" document (A-26) & "Response to Oikigiani Inuit Association Assessment of Environmental Information and Substantial Effects" document (A-29)	Interviewed Environmental and Regulatory Compliance Manager (as part of December 2019 report) - Interim Closure Reclamation Plan Version 5 has been approved by OIA subject to conditions.
21	Communications	IOL Lease - As-Built Designs submissions are outstanding.	21. Baffinland to provide relevant outstanding built plans and drawings to reflect changes in project scope and operational requirements. Where designs cannot be provided, Baffinland has committed to acquire additional Light Detection and Ranging (LIDAR) data to capture existing site infrastructure.	21.1. Has Baffinland developed relevant outstanding as-built plans and drawings to reflect changes in project scope and operational requirements?	x			Yes	Yes	Done	Environmental and Regulatory Compliance Manager	A-37 Construction Summary Report Waste Rock Facility Expansion and Drainage System Phase 2021, Figures 1-7 (page 3)	Steve Borcsok, P.Eng. - Approvals Manager (July 2022). One new construction summary report provided as part of 2021 OIA/NWB Annual Report for Operations
				21.2. For areas where designs cannot be provided, has Baffinland acquired additional LIDAR data to capture the existing site?		x		No	Yes	Done	Environmental and Regulatory Compliance Manager	"Tote Road Management Plan, Volume Calculations and Remedial Measures" submission on February 14, 2020 and supporting information	Interviewed Environmental and Regulatory Compliance Manager (as part of December 2019 report) - For areas where designs cannot be provided, Baffinland has acquired additional Photosat data and has provided it to OIA for 2019 (Photosat is being used instead of LIDAR). Interviewed Approvals Manager (March 2022). Photosat data is collected on an annual basis and provided to OIA. Data has been provided to OIA in 2020 and 2021.
22	Communications	Tote Road Alignment	22. Baffinland is required to provide information to confirm whether the Tote Road has been built to design and within the prescribed boundaries or extents of the land lease.	22.1. Has Baffinland confirmed whether the Tote Road has been built to design?		x			No	Done	Environmental and Regulatory Compliance Manager	N/A	Interviewed Environmental and Regulatory Compliance Manager (as part of June 2019 report) - This is not the intent of the commitment, as Baffinland is to provide current, as-built through Photosat. The Tote Road was not originally built to design, however Baffinland is providing current road specifications to OIA and Photosat information on the current road.
				22.2. Has Baffinland confirmed whether the Tote Road has been built within the prescribed boundaries of the land lease?	x			No	No	Done	Environmental and Regulatory Compliance Manager	"2018 Land Classification Amendment (Options Exercise Notice)" document (A-31)	Interviewed Environmental and Regulatory Compliance Manager (as part of June 2019 report) - There were areas of the Tote Road that were built outside of boundaries, however Baffinland applied to (Options Exercise Notice) OEN for revised boundaries. The Tote Road is inside the revised boundaries.
23	Communications	Waste Rock Facility management solution is outstanding.	23. Confirmation is required on measures that Baffinland plans to take to troubleshoot seepage issues associated with the collection pond for the waste rock facility: once reasons for seepages have been identified, confirmation must be provided on the action plan to address this issue.	23.1. Has Baffinland identified reasons for seepage in the collection pond at the waste rock facility?	x			No	No	Done	Environmental and Regulatory Compliance Manager	"Construction Summary Report - Mine Site Waste Rock Facility Pond Expansion and Drainage System" Section 1.1 (page 5)	Interviewed Environmental and Regulatory Compliance Manager - Investigations completed identified the integrity of the liner may have been compromised due to settlement of the subgrade material.
				23.2. Has an action plan been created to address the issue(s)?	x			No	No	Done	Environmental and Regulatory Compliance Manager	"Construction Summary Report, Mine Site Waste Rock Facility Pond Expansion and Drainage System" Section 1.1 (page 5) and Section 3 (pages 11-12)	Interviewed Environmental and Regulatory Compliance Manager - In Jan. 2020 Baffinland completed the expansion and re-lining of the WRF Pond, as documented in the Construction Summary Report

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					Yes	No	Non-applicable						
24	Roads Management Plan	Roads Management Plan remains outstanding.	24. Confirmation is required on when Baffinland will submit to the CIA approval an updated/revised Roads Management plan that addresses among other requirements, additional monitoring, as well as the comments and recommendations provided by CIA.	24.1. Has Baffinland developed a timeline and plan to submit an updated/revised Roads Management plan to CIA?	x			No	No	Done	Environmental and Regulatory Compliance Manager	"Road Management Plan" document, "Document Revision" section (Page 2) (refer to A-14)	
				24.2. Does the updated/revised Roads Management Plan address additional monitoring?	x			No	No	Done	Environmental and Regulatory Compliance Manager	"Road Management Plan" document, "Document Revision" section (Page 2) & "Operations" Section (Page 50) (refer to A-14)	
				24.3. Have comments and recommendations provided by the CIA been addressed in the updated/revised Roads Management Plan?	x			No	No	Done	Environmental and Regulatory Compliance Manager	"Road Management Plan & Mine Inlet Road Quarry and Borrow Source Management Plan" September 28, 2018 document (Page 3-10) (A-26)	Interviewed Environmental and Regulatory Compliance Manager (as part of June 2019 report) - All of the comments and recommendations provided by the CIA that were incorporated into Rev. 6, were also incorporated into Rev. 7 (latest version). Rev. 7 also includes an appendix for the Dust Monitoring Program.
25	IBA - Implementation - Non-Compliance MIEG	Under the IBA CIA has presented a Notice of Non-Compliance for achievement of the 2017 Minimum Inuit Employment Goal.	25. CIA has presented a detailed position on Best Efforts to the IBA Joint Executive Committee. The IBA Joint Executive Committee has deferred this topic to the President of CIA and Baffinland for direction.	25.1. Have the President of CIA and Baffinland had discussions to address the Notice of Non-Compliance for achievement of the 2017 MIEG and the CIAs detailed position on Best Efforts?	x			Yes	Yes	Done	IBA Reporting Specialist	"Re: Baffinland's Comprehensive Response to Inuit Training Program and Training Fund" letter dated July 5, 2018 (EM-A-12)  "Baffinland/CIA 2021/2022 Annual Work Plan lays out best efforts to attain MIEG's on each year (refer to A-84). The Inuit Certainty Agreement signed in June 2020, Article 11 lays out additional efforts to achieve MIEG's over a 3 year term moving forward (refer to A-40).	Interviewed IBA Reporting Specialist (as part of June 2019 report) - This issue was resolved on June 28, 2018 in Ottawa, Ontario between CIA and Baffinland. Their meeting followed a June 26-27 IIBA renegotiation session. The agreement in principle for the IBA was signed shortly thereafter as well. Each year an Annual Work Plan is signed between CIA and Baffinland with efforts clearly laid out to achieve MIEG's annually with set targets. The Inuit Certainty Agreement signed in June 2020 further moves the target for MIEG's from 1 year to a 3 year target and lays out best efforts to achieve MIEG's.
				25.2. Have the President of CIA and Baffinland reached an agreement on a strategy to address the Notice of Non-Compliance for achievement of the 2017 MIEG that includes time and resources?	x			Yes	Yes	Done	IBA Reporting Specialist	"Re: Baffinland's Comprehensive Response to Inuit Training Program and Training Fund" letter dated July 5, 2018 (EM-A-12)  "Baffinland/CIA 2021/2022 Annual Work Plan lays out best efforts to attain MIEG's on each year (refer to A-84). The Inuit Certainty Agreement signed in June 2020, Article 11 lays out additional efforts to achieve MIEG's over a 3 year term moving forward (refer to A-40).	Interviewed IBA Reporting Specialist (as part of June 2019 report) - Minimum Inuit Employment Goal is now being broken down by labour. This is being done by the Joint Executive Committee, which is comprised of equal parts BIM and CIA members. This is evidence of both Baffinland and CIA's agreement on best efforts moving forward. Each year an Annual Work Plan is signed between CIA and Baffinland with efforts clearly laid out to achieve MIEG's annually with set targets. The Inuit Certainty Agreement signed in June 2020 further moves the target for MIEG's from 1 year to a 3 year target and lays out best efforts to achieve MIEG's.
26	IBA	Building a route around the Tote Road to avoid further damage to equipment.	26. A resolution for this will be discussed with HTO representatives during the HTO site visit, scheduled for August 2018.	26. Has Baffinland met with HTO representatives for resolution on this topic?	x			No	No	Done	IBA Reporting Specialist	"Baffinland Iron Mines-Mary River Project Mittimatauk Hunters & Trappers Organization Site Tour Report" document, "Summary of Site Tour" section 2 (Page 4)	
27	IBA	Identifying monitoring locations, one terrestrial and one marine, to assist with project monitoring.	27. Baffinland will provide the MHTO representatives with information on all current monitoring stations for marine and terrestrial monitoring programs to begin discussions on resolution of this topic during the site visit, scheduled for the last summer months of 2018.	27.a. Has Baffinland provided the MHTO representatives with information on all current monitoring stations for marine and terrestrial monitoring programs?	x			No	No	Done	IBA Reporting Specialist	"Baffinland Iron Mines-Mary River Project Mittimatauk Hunters & Trappers Organization Site Tour Report" document, "Appendix B: Meeting Minutes (August 30, 2018)" section (Page 12) & "Appendix C: Meeting Minutes (August 31, 2018)" section (Page 20)	Interviewed IBA Reporting Specialist (as part of June 2019 report) - During the site visits by the MHTO, this information is provided. This is evidenced in minutes of the meeting and pictures of MHTO members visiting monitoring stations.
28	IBA	CIA to hold workshops with the HTO/community on the Wildlife Compensation Fund and how it works. CIA to consider amendments to the Wildlife Compensation Fund in the future based upon joint experiences with the program.	Baffinland supports this initiative and will continue to work with CIA to improve awareness on the Wildlife Compensation Fund managed by the CIA in the communities.	28.a. Has CIA completed any additional awareness raising related to the WCF and/or hosted workshops with HTO/community on the WCF and how it works.		x		No	No	Done	IBA Reporting Specialist	N/A	Interviewed IBA Reporting Specialist (as part of June 2019 report) - This is the responsibility of the CIA, and therefore not Baffinland's responsibility.
29	IBA Implementation - 2018 IBA Work Plan Implementation	2018 IBA Work Plan Implementation	29. CIA and Baffinland have agreed upon a 2018 IBA Work Plan. This Work Plan is focused upon delivery of the Skills and Partnership Fund Project (3-STEP) and implementation of the Inuit Human Resource Strategy. There are twenty (20) initiatives committed to under the 2018 IBA Work Plan.	29. Have all 20 initiatives committed to under the 2018 IBA Work Plan been implemented?	x			Yes	No	Done	IBA Reporting Specialist	"2018 Annual IBA Work Plan" document & Page 4 for details of the 20 Initiatives. (CO-A-1 180316 Approved 2018-2019 IBA Work Plan V2)  2021/2022 Annual Work Plan (A-84) is agreed to by both CIA and Baffinland. Best efforts are utilized and reports are submitted on a quarterly basis to the Joint Executive Committee on implementation.	Interviewed IBA Reporting Specialist (as part of June 2019 report) - All of the initiatives on Page 4 except for Tutlavitik Database (which is the responsibility of CIA) have been implemented.
30	IBA Implementation - IIBA Renegotiation	IBA Renegotiation	30. Parties shall discuss and confirm agreement upon all recommendations tabled to the point of achieving an Agreement-in-Principle on the IBA.	30.1. Have all parties engaged in discussion regarding the recommendations tabled for the IBA Renegotiation?	x			No	Yes	Done	IBA Reporting Specialist	"The Mary River Project Inuit Impact and Benefit Agreement" document.  IBA Renegotiation discussions are Done and Baffinland is participating in these with CIA.	Discussions surrounding an updated IBA are Done, Baffinland is fully participating in these discussions with CIA.
				30.2. Have all parties reached an 'Agreement-in-Principle' on the IBA?	x			No	Yes	Done	IBA Reporting Specialist	"The Mary River Project Inuit Impact and Benefit Agreement" document.  IBA Renegotiation discussions are Done and Baffinland is participating in these with CIA.	Discussions surrounding an updated IBA are Done, Baffinland is fully participating in these discussions with CIA.
31	IBA Implementation - Joint Agreement on Inuit Training	Joint Agreement on Inuit Training	31. A holistic approach to training, mindful of the efforts required to actively and positively increase Inuit employment shall be confirmed and incorporated into an Agreement-in-Principle on the IBA.	31. Has a plan to increase Inuit employment been incorporated into an 'Agreement-in-Principle' for the IBA?	x			Yes	Yes	Done	IBA Reporting Specialist	"The Mary River Project Inuit Impact and Benefit Agreement" document, "Article 7 Employment" section (page 57-66).  New Minimum Inuit Employment Targets are committed to as part of the Annual Work Plan Process (A-84). Training for Inuit is a big part of this and is clearly outlined in the AWP. The Qikiqani Skills and Training for Employment Partnership provides a clear path for continued Inuit training and Baffinland is meeting the objectives under this partnership. In addition the Inuit Certainty Agreement (A-40) introduces new three year MIEG targets which have been agreed to starting with the upcoming 2022/2023 Annual Work Plan Year.	MIEG Targets are set annually during the Annual Work Plan process. Baffinland uses best efforts to reach these targets on a Done basis. Training continues through the QSTEP program which will help to continue to increase Inuit Employment at the project.
32	IBA Implementation - Agreement in Principle	Agreement-in-Principle	32. An approved Agreement-in-Principle on the IBA, initiated by the President of CIA and the President of Baffinland, subject to final legal drafting and approval by CIA's Board of Directors and Baffinland shareholders.	32.1. Has an approved 'Agreement-in-Principle' been initiated by the Presidents of CIA and Baffinland?	x			No	Yes	Done	IBA Reporting Specialist	"The Mary River Project Inuit Impact and Benefit Agreement" document.  IBA Renegotiation discussions are Done and Baffinland is participating in these with CIA.	Baffinland is currently operating under the approved 2018 IBA. Discussions are Done for resigning an updated IBA.
				32.2. Has that 'Agreement-in-Principle' been drafted and finalized by legal representatives?	x			No	No	Done	IBA Reporting Specialist	"The Mary River Project Inuit Impact and Benefit Agreement" document	
				32.3. Has that 'Agreement-in-Principle' been ratified by CIA's Board and Baffinland's shareholders?	x			No	No	Done	IBA Reporting Specialist	"The Mary River Project Inuit Impact and Benefit Agreement" document	

Resolutions and Commitments

Name of Auditor:	BDO Canada LLP
Date of Audit:	2022-09-30

Completion Rate:	
Total # of audit questions with evidence provided supporting completion of the audit question	72
Percentage of applicable audit questions with evidence provided supporting completion of the audit question	97%

Concern #	Topic Area	Concern/Topic	Commitment Statement	Audit Question	Evidence Provided			Documented Evidence Changed (Yes or No)	Interview Notes Changed (Yes or No)	Status	Responsible Position	Documented Evidence	Interview Notes (Highlight the cell in Yellow if any changes to the Interview Notes were made)
					Yes	No	Non-applicable						
33	IBA Implementation - IBA Renegotiation	Royalty Agreement	33. An amended to Article 5 of the IIBA to address implications of the 2017 IIBA Arbitration Decision.	33.1. Has Article 5 of the IIBA been amended to address the implications of the 2017 IIBA Arbitration Decision?	x			No	Yes	Done	IIBA Reporting Specialist	"The Mary River Project Inuit and Benefit Agreement" document, 'Article 5 Financial Participation' section (Page 36-44)	Interviewed IIBA Reporting Specialist (as part of June 2019 report) - IIBA revisions to address 2017 arbitration decision were primarily reflected in Article 5.6 where clarification on royalties and associated payments were fleshed out and updated.  The Inuit Certainty Agreement (A-40) expands on royalty payments. It was agreed that calculation of Royalty payments would remain unchanged from current IIBA, however expansion on administration and management of Royalty payments is provided within the ICA documentation. It should be noted that some of these benefits are contingent on a Phase 2 approval.
Total					72	2	9						

Project Certificate (PC) Conditions

Project Certificate (PC) Conditions

Name of Auditor:	BDO Canada LLP
Date of Audit:	2022-09-30

Completion Rate:	
Total # of audit questions with evidence provided supporting completion of the audit question	69
Percentage of applicable audit questions with evidence provided supporting completion of the audit question	100%

Concern #	PC Condition #	Commitment Statement	Audit Question	Evidence Provided			Documented Evidence Changed (Yes or No)	Interview Notes Changed (Yes or No)	Status	Responsible Position	Documented Evidence	Interview Notes (Highlight the cell in Yellow if any changes to the Interview Notes were made)	
				Yes	No	Non-applicable							
1	10	The Proponent shall update its Dust Management and Monitoring Plan to address and/or include the following additional items: 1.a. Outline the specific plans for monitoring dust along the first few kilometers of the rail corridor leaving the Mary River mine site. 1.b. Identify the specific adaptive management measures to be considered should monitoring indicate that dust deposition from trains transporting along the rail route is greater than initially predicted.	Has Baffinland updated its Dust Management and Monitoring Plan to address and/or include the following additional items: 1.a. Does the Plan outline the specific plans for monitoring dust along the first few kilometers of the rail corridor leaving the Mary River Mine site? 1.b. Does the Plan identify the specific adaptive management measures to be considered should monitoring indicate that dust deposition from trains transporting along the rail route is greater than initially predicted?			x	No	No	Done	Sustainability Specialist	N/A	Interviewed Environmental and Regulatory Compliance Manager (as part of June 2019 report) - Not applicable since rail not yet planned/constructed. Therefore, there is no specific plans for monitoring dust along the rail corridor leaving the Mary River Mine site.	
		1.c. Outline specific plans for monitoring dustfall at intervals along and in the vicinity of the Milne Inlet Tote Road to determine the amount and extent of dustfall.	1.c. Does the Plan outline specific plans for monitoring dustfall at intervals along and in the vicinity of the Milne Inlet Tote Road to determine the amount and extent of dustfall?	x			No	Yes	Yes	Done	Sustainability Specialist	"Terrestrial Environment Mitigation and Monitoring Plan" document, "Vegetation and Monitoring: Dust fall" section 4-3, appendix B (page 104) (refer to B-1) "2021 Monitoring Overview: June 30 2021 Presentation to the TEWG". Additional dustfall monitoring stations added (pg. 8-11) (Refer to A.24) "2022 Monitoring Overview: June 23 2022 Presentation to the TEWG". Additional dustfall monitoring stations added (pg. 8) (Refer to B-2)	Additional dustfall stations added in 2021 presented to the TEWG in June 2021. Refer to A-24. Sustainability specialist/Manager, Community Resource Services (Sept 2022). Additional dustfall stations added in 2022 presented to the TEWG in June 2022.
		1.d. Identify the specific adaptive management measures to be considered if monitoring indicates that dust deposition from traffic on the Milne Inlet Tote Road is greater than initially predicted.	1.d. Does the Plan identify the specific adaptive management measures to be considered if monitoring indicates that dust deposition from traffic on the Milne Inlet Tote Road is greater than initially predicted?	x			Yes	No	Done	Sustainability Specialist		BM Air Quality and Noise Abatement Management Plan - Section 5.2.1 Table 9 (refer to B-3).	See Table 9 "Dustfall Performance Indicators and Thresholds"
		Measures for dustfall monitoring designed as follows: 2.a. To establish a pre-trucking baseline and collect data during Project operation for comparison	Measures for dustfall monitoring designed as follows: 2.a. Has the AEMP established a pre-trucking baseline and collected data during Project operation for comparison?	x			Yes	Yes	Done	Sustainability Specialist	"2020 Mary River Project Terrestrial Environment Annual Monitoring Report" document, "Dust Fall Monitoring Program" section B (Page 55-106)(refer to B-13). "2021 Annual Report for the NIRB" (Page 128 - 130)(refer to B-4)	Interviewed Environmental and Regulatory Compliance Manager - Additional data was collected during the 2020 field season. The draft annual report inclusive of dustfall results was submitted to the members of the Terrestrial Environment Working Group for comment in April 2021 and discussion of results were included as part of the 2020 Annual Report for the Nunavut Impact Review Board in May 2020. The final draft will include comment responses. Sustainability specialist/Manager, Community Resource Services (Sept 2022). Results reported on annually in the NIRB annual report and as part of the Terrestrial Environment Annual Monitoring Report (TEAMR). Final 2021 TEAMR was not released during period of audit. Final Report to be released in Q3 of 2022.	
2	21	2.b. To assess the seasonal deposition (rates, quantities) and chemical composition of dust entering aquatic systems along representative distance transects at right angles to the Tote Road and radiating outward from Milne Port and the Mine Site.	2.b. Has the AEMP assessed the seasonal deposition (rates, quantities) and chemical composition of dust entering aquatic systems along representative distance transects at right angles to the Tote Road and radiating outward from Milne Port and the Mine Site?	x			Yes	Yes	Done	Environmental and Regulatory Compliance Manager	B-28 "Aquatic Effects Monitoring Plan" document, (Page 9, 58-59) & B-29 "2021 Lake Sedimentation Monitoring Report" document, "Conclusions" section (Page 18)	Aquatic Effects Monitoring Plan updated in March 2022 Lake Sedimentation monitoring report updated for 2021	
		3. The Proponent shall adhere to the No-Net-Loss principle at all phases of the project to prevent or mitigate direct or indirect fish and fish habitat losses.	3. Has Baffinland developed policies and implemented procedures to ensure it adheres to the "No-Net-Loss" principle?	x			Yes	No	Done	Environmental and Regulatory Compliance Manager	B-30 "TOTE ROAD FISH HABITAT MONITORING 2021 ANNUAL REPORT" document, sections 1.1-1.2 (pages 1-2)		
4	47	4. The Proponent shall ensure that all Project infrastructure in watercourses are designed and constructed in such a manner that they do not unduly prevent and limit the movement of water in fish bearing streams and rivers.	4. Has all project infrastructure in watercourses been designed and constructed to not unduly prevent the movement of water in fish bearing streams and rivers?	x			Yes	No	Done	Environmental and Regulatory Compliance Manager	B-30 "TOTE ROAD FISH HABITAT MONITORING 2021 ANNUAL REPORT" document, "Section 3.0 - Aquatic Monitoring" section (Pages 6-9)	Interviewed Environmental and Regulatory Compliance Manager - Issues noted in the 2020 report will be addressed in 2021.	
5	48(a)	5.a. The Proponent shall develop plans to conduct additional surveys for the presence of arctic char in freshwater bodies in relation to the Tote Road...	5.a. Have plans been developed to conduct additional surveys for the presence of Arctic Char in Freshwater bodies in relation to the Tote Road?	x			No	No	Done	Environmental and Regulatory Compliance Manager	Technical Memo "Mary River Project: Milne Inlet Tote Road Monitoring: Results of Additional Stream Crossing Monitoring, 2021" (Section 1.0) (Refer to 3B-B-54)	Interviewed Environmental and Regulatory Compliance Manager (as part of June 2019 report) - Fish surveys undertaken by Baffinland are in general for Arctic Char.	
		5.b. and ongoing monitoring of arctic char health where applicable, within watersheds proximal to the Tote Road.	5.b. Has a plan been implemented to monitor Arctic Char health, within watersheds proximal to the Tote Road?		x		Yes	Yes	Done	Environmental and Regulatory Compliance Manager	B-28 "Aquatic Effects Monitoring Plan" document, section 3.3.6 Fish (Arctic Char) Health (pages 55-58)	Arctic Char health monitoring program implementation to begin in 2022 as described in Aquatic Effects Monitoring Plan	

Project Certificate (PC) Conditions

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Concern #	PC Condition #	Commitment Statement	Audit Question	Evidence Provided			Documented Evidence Changed (Yes or No)	Interview Notes Changed (Yes or No)	Status	Responsible Position	Documented Evidence	Interview Notes (Highlight the cell in Yellow if any changes to the Interview Notes were made)
				Yes	No	Non-applicable						
		5.c. The Proponent shall consult with the MHTO regarding the design, timing, and location of proposed surveys and ongoing monitoring.	5.c. Has Baffinland consulted the MHTO regarding the design, timing and location of proposed surveys and ongoing monitoring?	x			No	No	Done	Environmental and Regulatory Compliance Manager	"MHTO Meeting Minutes" (refer to B-31) and "Milne Freshwater Fish Health Study" (refer to B-32)	Interviewed Environmental and Regulatory Compliance Manager - Baffinland engaged the MHTO in 2021 to develop and implement monitoring arctic char monitoring. A meeting was held in Feb 2021, and scope of work prepared in July 2021 for MHTO review and comment.
6	53	The Proponent shall demonstrate consideration for the following (6a-6f): 6.a. Steps taken to prevent caribou mortality and injury as a result of train and vehicular traffic, including operational measures meant to maximize the potential for safe traffic relative to operations on the Milne Inlet Tote Road and associated access roads.	Has Baffinland demonstrated consideration for the following (6a-6f): 6.a. Have measures been taken to prevent caribou mortality and injury from vehicle traffic, particularly the Tote Road and associated access roads?	x			No	No	Done	Sustainability Specialist	"Terrestrial Environment Mitigation and Monitoring Plan" document, "Mortality Mitigation" sections 3.3.4, 3.3.5, and 3.3.6 (Page 53-55) (refer to B-1)	
		6.b. Specific measures intended to address the reduced effectiveness of visual protocols for the Milne Inlet Tote Road and access roads/trails during times of darkness and low visibility must be included.	6.b. Have measures been taken to address the effectiveness of visual protocols for the Tote Road and access roads during times of darkness?	x			Yes	Yes	Done	Sustainability Specialist	"Terrestrial Environment Mitigation and Monitoring Plan" document, "Mortality Mitigation" sections 3.3.4, 3.3.5, and 3.3.6 (Page 53-55) (refer to B-1) Refer to B-11 for an example of Tote Road speed adjustments based on weather conditions and visibility.	Sustainability specialist/Manager, Community Resource Services (Sept 2022). Additionally, Baffinland modifies vehicle speeds along the Tote Road and throughout site based on weather conditions and visibility to ensure that both wildlife and workers remain safe. These modifications are distributed to site personnel in the form of a daily weather report.
		6.c. Monitoring and mitigation measures at points where the Tote Road passes through caribou calving areas, particularly during caribou calving times. The details of these monitoring and mitigation measures shall be developed in conjunction with the Terrestrial Environment Working Group.	6.c. Have monitoring and mitigation measures, at points where the Tote Road passes through caribou calving areas, been developed in conjunction with the Terrestrial Environment Working Group?	x			Yes	Yes	Done	Sustainability Specialist	"Terrestrial Environment Mitigation and Monitoring Plan" document, Table 4-9 and Section 4.5.1 (refer to B-1) Refer to B-12 for recent discussions on caribou with the Terrestrial Environment Working Group (TEWG) in June 2022.	Sustainability specialist/Manager, Community Resource Services (Sept 2022). At the June 23rd, 2022 TEWG meeting, working group members and Baffinland discussed caribou monitoring, including recommended modifications to the current program. These recommendations included expanding the aerial survey area to the west, and changing the timing of the survey to ensure it does not coincide with GN surveys. These recommendations are being considered for the upcoming field seasons.
		6.d. Evaluation of the effectiveness of proposed caribou crossings over the Milne Inlet Tote Road and access roads as well as the appropriate number.	6.d. Have the proposed caribou crossings over the Tote Road and access been evaluated for effectiveness?	x			No	No	Done	Sustainability Specialist	"Terrestrial Environment Mitigation and Monitoring Plan" document, "Movement Mitigation" section 3.3.3 (page 52) & "Caribou Monitoring - Movement" appendix B4-9 section (Page 125) (refer to B-1)	
6 (cont'd)	53 (cont'd)	6.e. Protocols for documentation and reporting of all caribou collisions and mortalities...	6.e. Have protocols for documentation and reporting of all caribou collisions and mortalities been established?	x			Yes	Yes	Done	Sustainability Specialist	"Terrestrial Environment Mitigation and Monitoring Plan" document, "Mortality Mitigation" section 3.3.4 (page 53) (refer to B-1). Refer to B-5 for internal tracking log that documents all wildlife injuries and mortalities in Terrestrial Environment Annual Monitoring Report (TEAMR). Example included in section 12.1 Wildlife Interactions and Mortalities in the 2020 TEAMR (B-13).	Interviewed Sustainability Specialist (as part of June 2019 report). This section includes monitoring for sightings and reporting requirements concerning for mortality. Sustainability specialist/Manager, Community Resource Services (Sept 2022). Baffinland site environment uses an internal tracking log to document all wildlife injuries and mortalities, which includes the date, time, and location of the incident, as well as a description. This log is summarized in the Terrestrial Environment Annual Monitoring Report (TEAMR). The 2021 TEAMR has not been finalized at the time of this submission and is expected to be completed by the end of Q3 2022.
		6.f. as well as mechanisms for adaptive management responses designed to prevent further such interactions.	6.f. Has a mechanism for adaptive management response, which is designed to prevent further caribou interactions, been developed?	x			Yes	Yes	Done	Sustainability Specialist	Refer to the Caribou Decision Tree, Figure 3-2, p. 58 in the Terrestrial Environment Mitigation and Monitoring Plan (B-1). Additional mitigation measures for terrestrial wildlife can be found in section 3.3 Terrestrial Wildlife of the Terrestrial Environment Mitigation and Monitoring Plan, p. 51 (refer to B-1).	Interviewed Sustainability Specialist - No mortalities or caribou interactions have occurred. Sustainability specialist/Manager, Community Resource Services (Sept 2022). This is not applicable, as no mortalities or caribou interactions have occurred. However, Baffinland continues to implement mitigation measures to ensure the protection of caribou in the RSA. Regardless, a caribou decision tree exists.
7	76	7. The Proponent shall develop a comprehensive Environmental Effects Monitoring Program to address concerns and identify potential impacts of the Project on the marine environment.	7. Has Baffinland developed a comprehensive Environmental Effects Monitoring Program to address concerns and identify potential impacts of the project on the MARINE environment?	x			Yes	Yes	Done	Sustainability Specialist	"Marine Environmental Effects Monitoring Plan" document, "EEM Approach" section 2 (Page 11) (refer to B-7). Refer to the Final 2020 Marine Environmental Effects Monitoring Report (B-14), which outlines the current marine environmental effects monitoring program and results. Refer to 2021 NIRB Annual Report which provides the latest results for Monitoring Programs implemented in 2021 (see B-4 "Marine Monitoring Programs" Section)	Sustainability specialist/Manager, Community Resource Services (Sept 2022). Note that the 2021 Marine Environmental Effects Monitoring Report is under review at the time of this submission and will be completed prior to the end of Q3 2022. Programs are ongoing in 2022, starting in July 2022.

Project Certificate (PC) Conditions

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Concern #	PC Condition #	Commitment Statement	Audit Question	Evidence Provided			Documented Evidence Changed (Yes or No)	Interview Notes Changed (Yes or No)	Status	Responsible Position	Documented Evidence	Interview Notes (Highlight the cell in Yellow if any changes to the Interview Notes were made)
				Yes	No	Non-applicable						
8	83a	8.a. The Proponent shall conduct hydrodynamic modelling in the Milne Inlet Port area to determine the potential impacts arising from disturbance to sediments including re-suspension and subsequent transport and deposition of sediment.	8.a. Has Baffinland conducted hydrodynamic modelling in the Milne Inlet Port area to determine the potential impacts arising from the disturbance to sediments, including re-suspension and subsequent transport and deposition of sediment?	x			Yes	Yes	Done	Sustainability Specialist	"Baffinland Iron Mines 2021 Annual Report to the Nunavut Impact Review Board" presentation (Page 283-287) (Refer to B-4)	Sustainability specialist/Manager, Community Resource Services (Sept 2022). When completed, reported in the NIRB annual report
		8.b. The modelling results shall be used to update the marine water and sediment quality monitoring and mitigation program to include activities associated with the construction and operation of the Milne Inlet Port.	8.b. Have the modeling results been used to update the marine water and sediment quality monitoring and mitigation program to include activities associated with the construction and operation of the Milne Inlet Port?	x			Yes	Yes	Done	Sustainability Specialist	Refer to Baffinland Iron Mines 2021 Annual Report to the Nunavut Impact Review Board, p.283-287, B-4). Refer to B-9 showing proposed changes to 2022 program as shared with the Marine Environment Working Group (MEWG).	Sustainability specialist/Manager, Community Resource Services (Sept 2022). Changes and modifications to the 2022 marine environmental effects monitoring program based on previous results were outlined in WSP Golden's presentation to the MEWG on June 14th, 2022
		8.c. The monitoring program shall include an ongoing assessment of the potential introduction of metals that bio-accumulate in the marine food chain.	8.c. Does the monitoring program include an ongoing assessment of the potential introduction of metals that bio-accumulate in the marine food?	x			Yes	Yes	Done	Sustainability Specialist	Memo submitted to NIRB on Marine Mammal Health Monitoring (Refer to B-10) Refer to B-14 for methodologies and program results, as the 2021 MEEMP Report has not been finalized at the time of this submission. 2021 results available in B-4 (see PC condition 113)	Document submitted in response to recommendations/information request from NIRB. Sustainability specialist/Manager, Community Resource Services (Sept 2022). Metal concentrations are determined for sediment and water quality samples as per the Marine Environmental Effects Monitoring Program (MEEMP). Refer to B-14 for methodologies and program results, as the 2021 MEEMP Report has not been finalized at the time of this submission.
9	84	9.a. The Proponent shall update its sediment redistribution modeling once ship design has been completed and...	9.a. Has Baffinland updated its sediment redistribution modeling since ship design was completed?			x		No	Done	Sustainability Specialist	N/A	Interviewed Sustainability Specialist - Built for purpose ships were not commissioned for this phase of the Project, therefore question is not applicable.
		9.b. sampling should be undertaken to validate the model and to inform sampling sites and the monitoring plan.	9.b. Has sampling been undertaken by Baffinland to validate the model and to inform sampling sites and the monitoring plan?			x		No	Done	Sustainability Specialist	N/A	Interviewed Sustainability Specialist - Built for purpose ships were not commissioned for this phase of the Project, therefore question is not applicable.
10	85	10.a. The Proponent shall develop a monitoring plan to verify its impact predictions associated with sediment redistribution resulting from propeller wash in shallow water locations along the shipping route. If monitoring detects negative impacts from sediment redistribution, additional mitigation measures will need to be developed and implemented.	10.a. Has Baffinland developed a monitoring plan to verify its impact predictions associated with sediment redistribution resulting from propeller wash in shallow water locations along the shipping route?			x		No	Done	Sustainability Specialist	N/A	Interviewed Sustainability Specialist - PC Condition #85 was designed to address potential ship propeller wash effects in shallow water areas for the Southern Shipping Route, which is not applicable to the current phase of the Project.
		10.b. If monitoring detects negative impacts from sediment redistribution, additional mitigation measures will need to be developed and implemented.	10.b.1. Has the monitoring program detected any negative impacts from sediment redistribution?			x		No	Done	Sustainability Specialist	N/A	Interviewed Sustainability Specialist - PC Condition #85 was designed to address potential ship propeller wash effects in shallow water areas for the Southern Shipping Route, which is not applicable to the current phase of the Project.
			10.b.2. If negative impacts from sediment redistribution have been identified, have additional mitigation measures been developed and implemented?			x		No	Done	Sustainability Specialist	N/A	Interviewed Sustainability Specialist - PC Condition #85 was designed to address potential ship propeller wash effects in shallow water areas for the Southern Shipping Route, which is not applicable to the current phase of the Project.
11	87	11.a. The Proponent shall develop a detailed monitoring program at a number of sites over the long term to evaluate changes to marine habitat and organisms...	11.a. Has Baffinland developed a detailed monitoring program at a number of sites to evaluate changes to marine habitat and organisms?	x			Yes	Yes	Done	Sustainability Specialist	"Baffinland Iron Mines 2021 Annual Report to the Nunavut Impact Review Board" presentation (Page 293-294) (refer to B-4)	Sustainability specialist/Manager, Community Resource Services (Sept 2022). Program run annually including in 2022.
		11.b. and to monitor for non-native introductions resulting from Project-related shipping.	11.b. Does Baffinland monitor for non-native introductions resulting from Project-related shipping?	x			Yes	Yes	Done	Sustainability Specialist	"Baffinland Iron Mines 2021 Annual Report to the Nunavut Impact Review Board" presentation (Page 293-294) (refer to B-4)	Sustainability specialist/Manager, Community Resource Services (Sept 2022). Program run annually including in 2022.
		11.c. This program needs to be able to detect changes that may have biological consequences and should be initiated several years prior to any ballast water discharge into Steensby Inlet and Milne Inlet to collect sufficient baseline data and should continue over the life of the Project.	11.c. Does the program detect changes that may have biological consequences, including sufficient baseline data?	x			Yes	Yes	Done	Sustainability Specialist	"Baffinland Iron Mines 2021 Annual Report to the Nunavut Impact Review Board" presentation (Page 293-294) (refer to B-4)	Sustainability specialist/Manager, Community Resource Services (Sept 2022). Program run annually including in 2022.
12	89	12.a. The Proponent shall develop and implement an effective ballast water management program...	12.a. Has Baffinland developed and implemented a ballast water management program?	x			Yes	Yes	Done	Sustainability Specialist	"Baffinland Iron Mines 2021 Annual Report to the Nunavut Impact Review Board" presentation (Page 299-304) (refer to B-4) & "Ballast Water Management Plan" (refer to B-6)	Sustainability specialist/Manager, Community Resource Services (Sept 2022). Program run annually including in 2022.
		12.b. that may include the treatment and monitoring of ballast water discharges in a manner consistent with applicable regulations and/or exceed those regulations if they are determined to be ineffective for providing the desired and predicted results.	12.b. Does the water management program ensure that the treatment and monitoring of ballast water discharges are conducted in a manner consistent with applicable regulations?	x			Yes	Yes	Done	Sustainability Specialist	"Baffinland Iron Mines 2021 Annual Report to the Nunavut Impact Review Board" presentation (Page 299-304) (refer to B-4) & "Ballast Water Management Plan", "Relationship to Other Management Plans" section 1.1 (page 5) & Section 1.5.1 (page 6-8) refer to B-4) & "6.4.1 Ballast Water Management" (Page 38 in A.10) references to the Marine Monitoring Plan (B-6).	Interviewed Sustainability Specialist - NIRB annual report provides a summary of 2019 results collected through the Marine Environmental Effects Monitoring Program and Aquatic Invasive Species Program. Sustainability specialist/Manager, Community Resource Services (Sept 2022). Program run annually including in 2022.

Project Certificate (PC) Conditions

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Concern #	PC Condition #	Commitment Statement	Audit Question	Evidence Provided			Documented Evidence Changed (Yes or No)	Interview Notes Changed (Yes or No)	Status	Responsible Position	Documented Evidence	Interview Notes (Highlight the cell in Yellow if any changes to the Interview Notes were made)	
				Yes	No	Non-applicable							
		12.c. The ballast water management program shall include, without limitation, a provision that requires ship owners to test their ballast water to confirm that it meets the salinity requirements of the applicable regulations prior to discharge at the Milne Port...	12.c. Does the ballast water management program include a provision that requires ship owners to test their ballast water to confirm that it meets the salinity requirements of the applicable regulations prior to discharge at Milne Port?	x			Yes	No	Done	Sustainability Specialist	"Baffinland Iron Mines 2021 Annual Report to the Nunavut Impact Review Board" presentation (Page 299-304) (refer to B-4) & "Ballast Water Management Plan" document, "Monitoring and Controls" section 3 (Page 12) (refer to B-4)		
12 (cont'd)	89 (cont'd)	12.d. and a requirement noting that the Proponent, in choosing shipping contractors will, whenever feasible, give preference to contractors that use ballast water treatment in addition to ballast water exchange.	12.d. Does Baffinland choose shipping contractors, whenever feasible, that use ballast water treatment in addition to ballast water exchange?	x			Yes	Yes	Done	Sustainability Specialist / Manager Community Resources Services	"Baffinland Iron Mines 2021 Annual Report to the Nunavut Impact Review Board" presentation (Page 299-304) (refer to B-4) Refer to B-15 "2021 Vessels with BWTs" for summary of vessels that both treated and exchanged ballast water. A summary of ballast water management protocols, including exchange and treatment, for the 2022 season was given in slides 11-13 at the June 14th MEWG meeting (refer to A-21).	Interviewed Sustainability Specialist (as part of December 2019 report) - All vessels are required to follow regulatory requirements for ballast water exchange, treatment and management. Vessels are in the process of being fitted with treatment systems in a phased manner as required under D2 Compliance with the International Maritime Organization and Transport Canada regulatory standards. All vessels are anticipated to have treatment systems by 2024. Manager, Community Resource Services (Feb 2022): A total of 28 vessels had treatment systems installed on board out of the 38 contracted to BIM in 2021 (see attached list Bx-1). Those vessels with onboard treatment systems accounted for 55 calls to port out of 73 vessels (75%) that would have released ballast water in Milne Port that has also been treated. Breakdown of type of treatment system is also included (91% electro chlorination, remaining 9% UV). Standing instructions to Masters 2021 (refer to Bx-2 "SITM 2021") stipulates that all vessels with onboard BWTs treat and exchange water. Sustainability specialist/Manager, Community Resource Services (Sept 2022): Shipping season only begins in July so updates to be provided by end of year on vessel treatment systems.	
13	91	13.a. The Proponent shall develop a detailed monitoring plan for Steensby Inlet and Milne Inlet for fouling that complies with all applicable regulatory requirements and guidelines as issued by Transport Canada...	13.a. Has Baffinland developed a detailed monitoring plan for Steensby Port and Milne Inlet for fouling that complies with all applicable regulatory requirements and guidelines as issued by Transport Canada?	x			Yes	No	Done	Sustainability Specialist	"Baffinland Iron Mines 2021 Annual Report to the Nunavut Impact Review Board" presentation (Page 307-309) (refer to B-4)		
		13.b. and includes sampling areas on ships where antifouling treatment is not applied such as the areas where non-native species are most likely to occur.	13.b. Does this include sampling areas on ships where antifouling treatment is not applied, such as the areas where non-native species are most likely to occur?	x			Yes	Yes	Done	Sustainability Specialist	Refer to section 8.3.3, p. 1484 of the 2020 Marine Environmental Effects Monitoring Program Report (B-14) "Baffinland Iron Mines 2021 Annual Report to the Nunavut Impact Review Board" (Page 307 - 309) (refer to B-4)	Interviewed Sustainability Specialist - Extensive surveying is conducted along various areas of the ship (i.e. bow/stern, hull, nose, etc.). Sampling completed and reported in the 2019 NIB Annual Report and specialized report Draft: 2019 Marine Environmental Effects Monitoring Program (MEEMP) and Aquatic Invasive Species (AIS) Monitoring Program. Sustainability specialist/Manager, Community Resource Services (Sept 2022): Ship hull biofouling has been included in the NIS/AIS program since 2018 and consists of conducting under water video surveys of the hulls or ore carriers using ROV-based underwater video system.	
14	104	Subject to safety considerations and the potential for conditions as determined by the crew of transiting vessels, to result in route deviations:	Subject to safety considerations and the potential for conditions as determined by the crew of transiting vessels, to result in route deviations:			x	No	No	Done	Sustainability Specialist	N/A	Interviewed Sustainability Specialist1- This phase of the Project is not currently active therefore question is not applicable.	
		14.a. The Proponent shall require, for shipping to/from Steensby Port, project vessels to maintain a route to the south of Mill Island to prevent disturbance to walrus and walrus habitat on the northern shore of Mill Island.	14.a. Does Baffinland ensure project vessels shipping to/from Steensby Port maintain a route to the south of Mill Island to prevent disturbance to walrus and walrus habitat on the northern shore of Mill Island?			x	No	No	Done	Done	Sustainability Specialist	N/A	Interviewed Sustainability Specialist1- This phase of the Project is not currently active therefore question is not applicable.
		14.b. Where project vessels are required to transit to the north of Mill Island owing to environmental or other conditions, an incident report is to be provided to the Marine Environment Working Group and the NIB within 30 days...	14.b. If project vessels are required to transit to the north of Mill Island due to environmental or other conditions, does Baffinland provide an incident report to the Marine Environment Working Group and the NIB within 30 days?			x	Yes	No	Done	Done	Sustainability Specialist	"Baffinland Iron Mines 2021 Annual Report to the Nunavut Impact Review Board" presentation (Page 350-351) (Refer to B-4)	
		14.c. noting all wildlife sightings and interactions as recorded by shipboard monitors.	14.c. Does the incident report note all wildlife sightings and interactions as recorded by shipboard monitors?	x			Yes	No	Done	Sustainability Specialist	"Baffinland Iron Mines 2021 Annual Report to the Nunavut Impact Review Board" presentation (Page 350-351) (Refer to B-4)		
		14.d. The Proponent shall summarize all incidences of significant deviations from the nominal shipping routes for traffic to/from Milne Port and Steensby Port, subject to safety considerations as determined by the crew, and summarize all incidences of significant deviations from the nominal shipping routes for traffic to/from Milne Port and Steensby Port, as presented in the FEIS and FEIS Addendum to the NIB annually...	14.d. Does Baffinland give instructions to vessel captains to avoid significant deviations from the nominal shipping routes for traffic to/from Milne Port and Steensby Port, subject to safety considerations as determined by the crew, and summarize all incidences of significant deviations from the nominal shipping routes for traffic to/from Milne Port and Steensby Port, as presented in the FEIS and FEIS Addendum to the NIB annually?	x			Yes	No	Done	Sustainability Specialist	"Baffinland Iron Mines 2021 Annual Report to the Nunavut Impact Review Board" presentation (Page 350-351) (Refer to B-4) Refer to the 2022 Standing Instructions and General Information of Vessels Loading at Milne Inlet (B-16), which is distributed to all vessel owners and operators. All deviations from the shipping route are tracked by the community-based shipping monitors and captured in a deviation report (refer to B-17 for an example).		

Project Certificate (PC) Conditions

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				Yes	No	Non-applicable						
		14.a. with corresponding discussion regarding justification for deviations and any observed environmental impacts.	14.a. Has a corresponding discussion occurred regarding justification for deviations and any observed environmental impacts?	x			Yes	Yes	Done	Sustainability Specialist	"Baffinland Iron Mines 2021 Annual Report to the Nunavut Impact Review Board" presentation (Page 350-351) (Refer to B-4)	Sustainability specialist/Manager, Community Resource Services (Sept 2022):  Project vessels are required to leave the nominal shipping route near Ragged Island to access established anchorages at that location. The Project vessel tracks shown approaching and departing Pond Inlet in 2021 are from the MSV Botnica, which was the research vessel used to deploy and retrieve an acoustic monitoring device near Pond Inlet. Apart from these instances, there were no Project vessel deviations from the nominal shipping route in the RSA during the 2021 shipping season.
15	105	15.a. The Proponent shall ensure that measures to reduce the potential for interaction with marine mammals, particularly in Hudson Strait and Milne Inlet, are identified and implemented prior to commencement of shipping operations. These measures could include, but are not limited to...	15.a. Has Baffinland reduced the potential for interaction with marine mammals, particularly in Hudson Strait and Milne Inlet?	x			Yes	No	Done	Sustainability Specialist	"Baffinland Iron Mines 2021 Annual Report to the Nunavut Impact Review Board" presentation (Page 352-359) (Refer to B-4)  Refer to Table 5.1, p.19-20, 2022 Mitigation Measures for Marine Mammals in the 2022 NIRB Marine Shipping and Vessel Management Report (B-18).  Refer to section 5.5 of the 2022 Shipping and Marine Wildlife Management Plan, Appendix 1, of the 2022 NIRB Marine Shipping and Vessel Management Report (B-18).  Refer to section 5.2 of the 2022 Nunavut Adaptive Management Response Plan, p. 19, of the 2022 Shipping and Marine Wildlife Management Plan, Appendix 1, of the 2022 NIRB Marine Shipping and Vessel Management Report (B-18).	
		15.c. Reduced shipping speeds where ship-marine mammal interactions are most likely	15.c. Has Baffinland reduced shipping speeds where ship-marine mammal interactions are most likely?	x			Yes	Yes	Done	Sustainability Specialist	"Baffinland Iron Mines 2021 Annual Report to the Nunavut Impact Review Board" presentation (Page 352-359) (Refer to B-4)  Refer to Table 4.2 Summary of Engagement Outcomes, p. 19, row 1 of the 2022 NIRB Marine Shipping and Vessel Management Report (B-18).	Interviewed Sustainability Specialist (as part of December 2019 report) - Speeds have been reduced below project requirements (should be 7-10 knots) as Baffinland has communicated and enforced a speed limit of 9 knots for all Baffinland-contracted vessels throughout the 2019 shipping season.  Sustainability specialist/Manager, Community Resource Services (Sept 2022): Baffinland continues to enforce a speed limit of 9 nm/h for all Baffinland contracted vessels. The MHFO recommended a further reduction in speed and Baffinland explored this option and determined that speeds cannot be lowered for various reasons.
16	106	16.a. The Proponent shall ensure that shipboard observers are employed during seasons where shipping occurs	16.a. Has Baffinland ensured that shipboard observers are employed during seasons where shipping occurs?			x	Yes	Yes	Done	Sustainability Specialist	"Baffinland Iron Mines 2021 Annual Report to the Nunavut Impact Review Board" presentation (Page 360-362) (Refer to B-4)  Refer to B-9 (slides 21 and 22) for details on SBO program planned for 2022.	Sustainability specialist/Manager, Community Resource Services (Sept 2022):  Baffinland will be conducting a two-week shipboard observer program in October, 2022, which was outlined in the June 14th, 2022 MEWG meeting by WSP Golder
		16.b. and provided with the means to effectively carry out assigned duties.	16.b. Has Baffinland provided shipboard observers with the means to carry out assigned duties?			x	Yes	Yes	Done	Sustainability Specialist	"Baffinland Iron Mines 2021 Annual Report to the Nunavut Impact Review Board" presentation (Page 360-362) (Refer to B-4)  Refer to B-19 for the SBO Training Manual that is provided to participants.	All SBOs undergo internal training with WSP Golder, and must complete their marine standard for training, certification, and watchkeeping (STCW) certificate prior to participating in the program.  SBO Training Manual that is provided to participants. This manual was used during the last SBO program in 2019 and will be consistent with training provided for 2022.

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				Yes	No	Non-applicable						
17	109	17.a. The Proponent shall conduct a monitoring program to confirm the predictions in the FEIS with respect to disturbance effects from ships noise on the distribution and occurrence of marine mammals.	17.a. Has a monitoring program been implemented that confirms the predictions in the FEIS with respect to disturbance effects from ships noise on the distribution and occurrence of marine mammals?	x			Yes	Yes	Done	Sustainability Specialist	"Saffinland Iron Mines 2021 Annual Report to the Nunavut Impact Review Board" presentation (Page 369-376) (Refer to B-4) Refer to Table 4.26 Marine Mammals Impact Evaluation of the 2021 NIRB Annual Report and section 4, p. 361-370 (B-4). Refer to B-20 for the Final 2021 Passive Acoustic Monitoring Program Report. Refer to B-21 and B-22 for the 2020 Brucehead Shore-based Monitoring Report and Marine Mammal Aerial Survey Report, respectively	Sustainability specialist/Manager, Community Resource Services (Sept 2022); Note that the 2021 final marine reports are not available for release at the time of this submission and are expected to be completed by the end of Q3 2022 but results were made available in the 2021 NIRB Annual report.
		17.b. The survey shall be designed to address effects during the shipping seasons, and include locations in Hudson Strait.	17.b. Has the survey been designed to address affects during the shipping seasons, and include locations in Hudson Strait?			x	No	No	Done	Sustainability Specialist	N/A	Interviewed Sustainability Specialist - This phase of the Project is not currently active therefore question is not applicable.
		17.c. Foxe Basin.	17.c. Foxe Basin?			x	No	No	Done	Sustainability Specialist	N/A	Interviewed Sustainability Specialist - This phase of the Project is not currently active therefore question is not applicable.

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				Yes	No	Non-applicable						
17 (cont'd)	109 (cont'd)	17.d. Mine Inlet.	17.d. Mine Inlet?	x			Yes	Yes	Done	Sustainability Specialist	"Baffinland Iron Mines 2021 Annual Report to the Nunavut Impact Review Board" presentation (Page 369-376) (Refer to B-4) Refer to Table 4.26 Marine Mammals Impact Evaluation of the 2021 NIRB Annual Report and section 4, p. 361-370 (B-4). Refer to B-20 for the Final 2021 Passive Acoustic Monitoring Program Report. Refer to B-21 and B-22 for the 2020 Brucehead Shore-based Monitoring Report and Marine Mammal Aerial Survey Report, respectively.	Sustainability specialist/Manager, Community Resource Services (Sept 2022). Note that the 2021 final marine reports are not available for release at the time of this submission and are expected to be completed by the end of Q3 2022. Results were presented as part of 2021 Annual Report to the NIRB
		17.e. Eclipse Sound.	17.e. Eclipse Sound?	x			Yes	Yes	Done	Sustainability Specialist	"Baffinland Iron Mines 2021 Annual Report to the Nunavut Impact Review Board" presentation (Page 369-376) (Refer to B-4) Refer to Table 4.26 Marine Mammals Impact Evaluation of the 2021 NIRB Annual Report and section 4, p. 361-370 (B-4). Refer to B-20 for the Final 2021 Passive Acoustic Monitoring Program Report. Refer to B-21 and B-22 for the 2020 Brucehead Shore-based Monitoring Report and Marine Mammal Aerial Survey Report, respectively.	Sustainability specialist/Manager, Community Resource Services (Sept 2022). Note that the 2021 final marine reports are not available for release at the time of this submission and are expected to be completed by the end of Q3 2022. Results were presented as part of 2021 Annual Report to the NIRB
		17.f. and Pond Inlet.	17.f. and Pond Inlet?	x			Yes	Yes	Done	Sustainability Specialist	"Baffinland Iron Mines 2021 Annual Report to the Nunavut Impact Review Board" presentation (Page 369-376) (Refer to B-4) Refer to Table 4.26 Marine Mammals Impact Evaluation of the 2021 NIRB Annual Report and section 4, p. 361-370 (B-4). Refer to B-20 for the Final 2021 Passive Acoustic Monitoring Program Report. Refer to B-21 and B-22 for the 2020 Brucehead Shore-based Monitoring Report and Marine Mammal Aerial Survey Report, respectively.	Sustainability specialist/Manager, Community Resource Services (Sept 2022). Note that the 2021 final marine reports are not available for release at the time of this submission and are expected to be completed by the end of Q3 2022. Results were presented as part of 2021 Annual Report to the NIRB
		17.g. The survey shall continue over a sufficiently lengthy period to determine the extent to which habituation occurs for narwhal...	17.g. Has monitoring been conducted to determine the extent to which habituation occurs for narwhal? (Auditor to record # years of monitoring in Evidence cell.)	x			Yes	Yes	Done	Sustainability Specialist	Baffinland Iron Mines 2021 Annual Report to the Nunavut Impact Review Board" presentation (Page 369-376) (Refer to B-4) Refer to Table 4.26 Marine Mammals Impact Evaluation of the 2021 NIRB Annual Report and section 4, p. 361-370 (B-4). Refer to B-20 for the Final 2021 Passive Acoustic Monitoring Program Report. Refer to B-21 and B-22 for the 2020 Brucehead Shore-based Monitoring Report and Marine Mammal Aerial Survey Report, respectively. Note that the 2021 final marine reports are not available for release at the time of this submission and are expected to be completed by the end of Q3 2022.	Sustainability specialist/Manager, Community Resource Services (Sept 2022). Note that the 2021 final marine reports are not available for release at the time of this submission and are expected to be completed by the end of Q3 2022. Results were presented as part of 2021 Annual Report to the NIRB
		17.h. Beluga...	17.h. Beluga?	x			Yes	Yes	Done	Sustainability Specialist	Baffinland Iron Mines 2021 Annual Report to the Nunavut Impact Review Board" presentation (Page 369-376) (Refer to B-4) Refer to Table 4.26 Marine Mammals Impact Evaluation of the 2021 NIRB Annual Report and section 4, p. 361-370 (B-4). Refer to B-20 for the Final 2021 Passive Acoustic Monitoring Program Report. Refer to B-22 for the 2020 Marine Mammal Aerial Survey Program (MMASP) Report. Note that the 2021 final MMASP report is not available for release at the time of this submission and is expected to be completed by the end of Q3 2022.	Sustainability specialist/Manager, Community Resource Services (Sept 2022). Note that the 2021 final marine reports are not available for release at the time of this submission and are expected to be completed by the end of Q3 2022. Results were presented as part of 2021 Annual Report to the NIRB
		17.i. Bowhead...	17.i. Bowhead?	x			Yes	No	Done	Sustainability Specialist	Baffinland Iron Mines 2021 Annual Report to the Nunavut Impact Review Board" presentation (Page 369-376) (Refer to B-4) Refer to Table 4.26 Marine Mammals Impact Evaluation of the 2021 NIRB Annual Report and section 4, p. 361-370 (B-4). Refer to B-20 for the Final 2021 Passive Acoustic Monitoring Program Report. Refer to B-22 for the Marine Mammal Aerial Survey Program (MMASP) Report.	
		17.j. and Walrus?	17.j. and Walrus?	x			Yes	Yes	Done	Sustainability Specialist	Baffinland Iron Mines 2021 Annual Report to the Nunavut Impact Review Board" presentation (Page 369-376) (Refer to B-4) Refer to Table 4.26 Marine Mammals Impact Evaluation of the 2021 NIRB Annual Report and section 4, p. 361-370 (B-4). Refer to B-20 for the Final 2021 Passive Acoustic Monitoring Program Report. Refer to B-22 for the Marine Mammal Aerial Survey Program (MMASP) Report.	Sustainability specialist/Manager, Community Resource Services (Sept 2022). Note that the 2021 final MMASP report is not available for release at the time of this submission and is expected to be completed by the end of Q3 2022. Results were presented as part of 2021 Annual Report to the NIRB

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				Yes	No	Non-applicable						
18	110	18.a. The Proponent shall immediately develop a monitoring protocol that includes, but is not limited to, acoustical monitoring.	18.a. Has Baffinland developed a monitoring protocol that includes, but is not limited to, acoustical monitoring?	x			Yes	Yes	Done	Sustainability Specialist	"Baffinland Iron Mines 2021 Annual Report to the Nunavut Impact Review Board" presentation (Page 377-380) (refer to B-4) Refer to Table 4.26 Marine Mammals Impact Evaluation of the 2021 NIRB Annual Report and section 4, p. 361-370 (B-4). Refer to B-20 for the Final 2021 Passive Acoustic Monitoring Program Report.	Sustainability specialist/Manager, Community Resource Services (Sept 2022). Note that the 2021 final MMASP report is not available for release at the time of this submission and is expected to be completed by the end of Q3 2022. Results were presented as part of 2021 Annual Report to the NIRB.
		18.b. to facilitate assessment of the potential short term, long term, and cumulative effects of vessel noise on marine mammals and marine mammal populations.	18.b. Does the protocol facilitate assessment of the potential short term, long term, and cumulative effects of vessel noise on marine mammals and marine mammal populations?	x			Yes	Yes	Done	Sustainability Specialist	"Baffinland Iron Mines 2021 Annual Report to the Nunavut Impact Review Board" presentation (Page 377-380) (refer to B-4) Refer to Table 4.26 Marine Mammals Impact Evaluation of the 2021 NIRB Annual Report and section 4, p. 361-370 (B-4). Refer to B-20 for the Final 2021 Passive Acoustic Monitoring Program Report.	Sustainability specialist/Manager, Community Resource Services (Sept 2022). Note that the 2021 final MMASP report is not available for release at the time of this submission and is expected to be completed by the end of Q3 2022. Results were presented as part of 2021 Annual Report to the NIRB.
		18.c. The Proponent is expected to work with the Marine Environment Working Group to determine appropriate early warning indicator(s) that will ensure rapid identification of negative impacts along the southern and northern shipping routes.	18.c. Is Baffinland working with the Marine Environment Working Group to determine appropriate early warning indicators that will ensure rapid identification of negative impacts along the northern shipping routes?	x			Yes	Yes	Done	Sustainability Specialist	Refer to Section 4, p. 329-343, of the 2021 NIRB Annual Report (B-4).	Sustainability specialist/Manager, Community Resource Services (Sept 2022). WSP Golder is currently drafting an EWI Memo to be circulated to the MEWG.
19	111	19.a. The Proponent shall develop clear thresholds for determining if negative impacts as a result of vessel noise are occurring.	19.a. Has Baffinland developed clear thresholds for determining if negative impacts as a result of vessel noise are occurring?	x			Yes	Yes	Done	Sustainability Specialist	"Baffinland Iron Mines 2021 Annual Report to the Nunavut Impact Review Board" presentation (Page 381-384) (refer to B-4) A Threshold, Action, Response Plan for the Marine Environment and Marine Mammals was provided to the NIRB in March 2021. Refer to B-23. Refer to Table 4.26 Marine Mammals Impact Evaluation of the 2021 NIRB Annual Report and section 4, p. 353-364 (B-4). Refer to B-20 for the Final 2021 Passive Acoustic Monitoring Program Report.	
		19.b. Mitigation and adaptive management practices shall be developed to restrict negative impacts as a result of vessel noise. This shall include, but not be limited to ...	19.b. Have mitigation and adaptive management practices been developed to restrict negative impacts as a result of vessel noise?	x			Yes	No	Done	Sustainability Specialist	A Threshold, Action, Response Plan for the Marine Environment and Marine Mammals was provided to the NIRB in March 2021. Refer to B-23. Refer to section 4, p. 365-368 of the 2021 NIRB Annual Report (B-4).	
		19.c. Identifications of zones where cumulative noise could be mitigated due to biophysical features (e.g., water depth, distance from migration routes, distance from overwintering areas etc.)	19.c. Have zones been identified where cumulative noise could be mitigated due to biophysical features (e.g., water depth, distance from migration routes, distance from overwintering areas etc.)?			x	Yes	Yes	Done	Sustainability Specialist	"Baffinland Iron Mines 2021 Annual Report to the Nunavut Impact Review Board" presentation (Page 381-384, 385-386) (Refer to B-4)	Interviewed Sustainability Specialist (as part of December 2019 report) - Baffinland has not completed this exercise. They have not defined bathymetry or seafloor geoaoustics along the entire shipping route, though some assumptions are made in modelling where information is available. Sustainability specialist/Manager, Community Resource Services (Sept 2022). Shipping is limited to July to October only and away from overwintering areas
		19.d. Vessel transit planning, for all seasons, to determine the degree to which cumulative sound impacts can be mitigated through the seasonal use of different zones	19.d. Has vessel transit planning, for all seasons, determined the degree to which cumulative sound impacts can be mitigated through the seasonal use of different zones?			x	Yes	Yes	Done	Sustainability Specialist	"Baffinland Iron Mines 2021 Annual Report to the Nunavut Impact Review Board" presentation (Page 381-384, 385-386) (Refer to B-4)	Interviewed Sustainability Specialist (as part of December 2019 report) - Baffinland has not completed this exercise. They have not defined bathymetry or seafloor geoaoustics along the entire shipping route, though some assumptions are made in modelling where information is available. Sustainability specialist/Manager, Community Resource Services (Sept 2022). Shipping is limited to July to October only and away from overwintering areas

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				Yes	No	Non-applicable						
20	112	20.a. Prior to commercial shipping of iron ore, the Proponent, in conjunction with the Marine Environment Working Group, shall develop a monitoring protocol that includes, but is not limited to, acoustical monitoring that provides an assessment of the negative effects (short and long term cumulative) of vessel noise on marine mammals.	20.a. Has Baffinland, in conjunction with the Marine Environment Working Group, developed a monitoring protocol that includes acoustical monitoring that provides an assessment of the negative effects (short, long term and cumulative) of vessel noise on marine mammals?	x			Yes	No	Done	Sustainability Specialist	"Baffinland Iron Mines 2021 Annual Report to the Nunavut Impact Review Board" presentation (Page 385-386) (Refer to B-4) Refer to Table 4.26 Marine Mammals Impact Evaluation of the 2021 NIRB Annual Report and section 4, p. 361-370 (B-4). Refer to B-20 for the Final 2021 Passive Acoustic Monitoring Program Report. Note that Baffinland decreased the scope of its 2022 acoustic monitoring program due to lack of support from the MRFO.	
		20.b. Monitoring protocols will need to carefully consider the early warning indicator(s) that will be best examined to ensure rapid identification of negative impacts.	20.b. Do monitoring protocols carefully consider the early warning indicators to ensure rapid identification of negative impacts?	x			Yes	No	Done	Sustainability Specialist	"Baffinland Iron Mines 2021 Annual Report to the Nunavut Impact Review Board" presentation (Page 385-386) (Refer to B-4) Refer to B-20 for the Final 2021 Passive Acoustic Monitoring Program Report.	
		20.c. Thresholds shall be developed to determine if negative impacts as a result of vessel noise are occurring.	20.c. Has a threshold for negative impacts caused by vessel noise been developed?	x			Yes	No	Done	Sustainability Specialist	"Baffinland Iron Mines 2021 Annual Report to the Nunavut Impact Review Board" presentation (Page 385-386) (Refer to B-4) A Threshold, Action, Response Plan for the Marine Environment and Marine Mammals was provided to the NIRB in March 2021. Refer to B-23. Refer to p. 358-359 of the 2021 NIRB Annual Report (B-4).	
		20.d. Mitigation and adaptive management practices shall be developed to restrict negative impacts as a result of vessel noise. This shall include, but not be limited to...	20.d. Have mitigation and adaptive management practices been developed to restrict negative impacts as a result of vessel noise?	x			Yes	No	Done	Sustainability Specialist	A Threshold, Action, Response Plan for the Marine Environment and Marine Mammals was provided to the NIRB in March 2021. Refer to B-23. Refer to p. 369-370, p. 388, and Appendix C.25 of the 2021 NIRB Annual Report (B-4).	
		20.e. Identification of zones where noise could be mitigated due to biophysical features (e.g., water depth, distance from migration routes, distance from overwintering areas etc.)	20.e. Have zones been identified where noise could be mitigated due to biophysical features (e.g., water depth, distance from migration routes, distance from overwintering areas etc.)?	x			Yes	No	Done	Sustainability Specialist	"Baffinland Iron Mines 2021 Annual Report to the Nunavut Impact Review Board" presentation (Page 385-386) (Refer to B-4) Refer to p. 371-387 and Appendix C.1 and E of the 2021 NIRB Annual Report (B-4).	
		20.f. A monitoring and mitigation plan is to be developed, and approved by Fisheries and Oceans Canada prior to the commencement of blasting in marine areas	20.f. Has a monitoring and mitigation plan been developed, and approved by Fisheries and Oceans Canada, prior to the commencement of blasting in marine areas?			x	No	Yes	Done	Sustainability Specialist	"Baffinland Iron Mines 2021 Annual Report to the Nunavut Impact Review Board" presentation (Page 385-386) (Refer to B-4)	Sustainability specialist/Manager, Community Resource Services (Sept 2022). Not applicable in 2022. Blasting not occurring.
		21.a. The Proponent shall conduct monitoring of marine fish and fish habitat, which includes but is not limited to, monitoring for Arctic Char	21.a. Does Baffinland conduct monitoring of marine fish and fish habitat, which includes but is not limited to, monitoring for Arctic Char?	x			Yes	No	Done	Sustainability Specialist	"Baffinland Iron Mines 2021 Annual Report to the Nunavut Impact Review Board" presentation (Page 387-399) (Refer to B-4) Refer to p. 379-384 of the 2021 NIRB Annual Report (B-4). Refer to chapters 6.0 & 7.0 of the 2020 M/EEMP AIS/NIS report (B-14).	

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21	113	21.b. stock size and health condition in Steensby Inlet, as recommended by the Marine Environment Working Group	21.b. Does the monitoring measure stock size and health condition in Steensby Inlet, as recommended by the Marine Environment Working Group?			x	No	No	Done	Sustainability Specialist	N/A	Interviewed Sustainability Specialist (as part of December 2019 report) - This phase of the Project is not currently active therefore question is not applicable.
		21.c. stock size and health condition in Milne Inlet, as recommended by the Marine Environment Working Group	21.c. Does the monitoring measure stock size and health condition in Milne Inlet as recommended by the Marine Environment Working Group?	x			Yes	No	Done	Sustainability Specialist	"Baffinland Iron Mines 2021 Annual Report to the Nunavut Impact Review Board" presentation (Page 387-399) (Refer to B-4) Refer to the 2022 Standing Instructions and General Information of Vessels Loading at Milne Inlet (B-16), which is distributed to all vessel owners and operators. Refer to p. 394-397 of the 2021 NIRB Annual Report (B-4).	Sustainability specialist/Manager, Community Resource Services (Sept 2022). Program run annually and reported in annual report to the NIRB.

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				Yes	No	Non-applicable						
22	120	22.a. The Proponent shall ensure that, subject to vessel and human safety considerations, all project shipping adhere to the following mitigation procedures while in the vicinity of marine mammals...	22.a. Has Baffinland ensured that, subject to vessel and human safety considerations, all project shipping adheres to mitigation procedures while they are in the vicinity of marine mammals?	x			Yes	No	Done	Sustainability Specialist	"Baffinland Iron Mines 2021 Annual Report to the Nunavut Impact Review Board" presentation (Page 410-413) (Refer to B-4) Refer to the 2022 Standing Instructions and General Information of Vessels Loading at Milne Inlet (B-16), which is distributed to all vessel owners and operators. Refer to section 5 of the 2022 NIRB Marine Shipping and Vessel Management Report (B-18).	
		22.b. Wildlife will be given right of way	22.b. Has Baffinland ensured that wildlife will be given the right of way?	x			Yes	No	Done	Sustainability Specialist	Refer to the 2022 Standing Instructions and General Information of Vessels Loading at Milne Inlet (B-16), which is distributed to all vessel owners and operators. Refer to section 5 of the 2022 NIRB Marine Shipping and Vessel Management Report (B-18). Refer to p. 394-397 of the 2021 NIRB Annual Report (B-4).	
		22.c. Ships will when possible, maintain a straight course and constant speed, avoiding erratic behavior	22.c. Has Baffinland ensured that ships will, when possible, maintain a straight course and constant speed, avoiding erratic behavior?	x			Yes	No	Done	Sustainability Specialist	"Baffinland Iron Mines 2021 Annual Report to the Nunavut Impact Review Board" presentation (Page 410-413) (Refer to B-4) Refer to the 2022 Standing Instructions and General Information of Vessels Loading at Milne Inlet (B-16), which is distributed to all vessel owners and operators. Refer to section 5 of the 2022 NIRB Marine Shipping and Vessel Management Report (B-18).	
		22.d. When marine mammals appear to be trapped or disturbed by vessel movements, the vessel will implement appropriate measures to mitigate disturbance, including stoppage of movement until wildlife have moved away from the immediate area.	22.d. Has Baffinland ensured that when marine mammals appear to be trapped or disturbed by vessel movements, the vessel will implement appropriate measures to mitigate disturbance, including stoppage of movement until wildlife have moved away from immediate area?	x			Yes	No	Done	Sustainability Specialist	"Baffinland Iron Mines 2021 Annual Report to the Nunavut Impact Review Board" presentation (Page 410-413) (Refer to B-4) Refer to the 2022 Standing Instructions and General Information of Vessels Loading at Milne Inlet (B-16), which is distributed to all vessel owners and operators. Refer to section 5 of the 2022 NIRB Marine Shipping and Vessel Management Report (B-18).	
23	121	23a. The Proponent shall immediately report any accidental contact by project vessels with marine mammals or seabird colonies to Fisheries and Oceans Canada and Environment Canada...	23.a. Has Baffinland ensured Fisheries and Oceans Canada and Environment Canada are contacted immediately should any accidental contact by project vessels with marine mammals or seabird colonies occur?	x			Yes	No	Done	Sustainability Specialist	"Baffinland Iron Mines 2021 Annual Report to the Nunavut Impact Review Board" presentation (Page 414-415) (Refer to B-4) Refer to p. 398-399 of the 2021 NIRB Annual Report (B-4).	
		23.b. (And), by notifying the appropriate regional office of the: • Date, time and location of the incident; • Date, time and location of the incident; • Species of marine mammal or seabird involved; • Circumstances of the incident; • Weather and sea conditions at the time; • Observed state of the marine mammal or sea bird colony after the incident; and, • Direction of travel of the marine mammal after the incident, to the extent that it can be determined.	23.b. Does Baffinland also notify the appropriate regional office of the following: • Date, time and location of the incident; • Species of marine mammal or seabird involved; • Circumstances of the incident; • Weather and sea conditions at the time; • Observed state of the marine mammal or sea bird colony after the incident; and, • Direction of travel of the marine mammal after the incident, to the extent that it can be determined.	x			Yes	No	Done	Sustainability Specialist	"Baffinland Iron Mines 2021 Annual Report to the Nunavut Impact Review Board" presentation (Page 414-415) (Refer to B-4) Refer to p. 398-399 of the 2021 NIRB Annual Report (B-4).	
24	123	24.a. The Proponent shall provide sufficient marine mammal observer coverage on project vessels to ensure that collisions with marine mammals and seabird colonies are observed and reported through the life of the Project.	24.a. Does Baffinland provide sufficient marine mammal observer coverage on project vessels to ensure that collisions with marine mammals and seabird colonies are observed and reported through the life of the project?	x			Yes	No	Done	Sustainability Specialist	"Baffinland Iron Mines 2021 Annual Report to the Nunavut Impact Review Board" presentation (Page 418-420) (Refer to B-4) Refer to p. 402-404 of the 2021 NIRB Annual Report (B-4).	
		24.b. The marine wildlife observer protocol shall include, but not be limited to, protocols for marine mammals...	24.b. Does the protocol for the marine wildlife observer include protocols for marine mammals?	x			Yes	No	Done	Sustainability Specialist	"Baffinland Iron Mines 2021 Annual Report to the Nunavut Impact Review Board" presentation (Page 418-420) (Refer to B-4) Refer to p. 402-404 of the 2021 NIRB Annual Report (B-4). Refer to B-19 for the Shipboard Observer Training Manual, which includes protocols that will be followed during the 2022 SBO Program.	
		24.c. seabirds...	24.c. Does the protocol for the marine wildlife observer include protocols for seabirds?	x			Yes	No	Done	Sustainability Specialist	"Baffinland Iron Mines 2021 Annual Report to the Nunavut Impact Review Board" presentation (Page 418-420) (Refer to B-4) Refer to p. 402-404 of the 2021 NIRB Annual Report (B-4). Refer to B-19 for the Shipboard Observer Training Manual, which includes protocols that will be followed during the 2022 SBO Program.	
		24.d. and environmental conditions	24.d. Does the protocol for the marine wildlife observer include protocols for environmental conditions?	x			Yes	No	Done	Sustainability Specialist	"Baffinland Iron Mines 2021 Annual Report to the Nunavut Impact Review Board" presentation (Page 418-420) (Refer to B-4) Refer to p. 402-404 of the 2021 NIRB Annual Report (B-4). Refer to section 5.10 of the SBO Training Manual (B-19).	

Project Certificate (PC) Conditions

Name of Auditor: BDO Canada LLP

Date of Audit: 2022-09-30

Completion Rate:	
Total # of audit questions with evidence provided supporting completion of the audit question	69
Percentage of applicable audit questions with evidence provided supporting completion of the audit question	100%

Concern #	PC Condition #	Commitment Statement	Audit Question	Evidence Provided			Documented Evidence Changed (Yes or No)	Interview Notes Changed (Yes or No)	Status	Responsible Position	Documented Evidence	Interview Notes (Highlight the cell in Yellow if any changes to the Interview Notes were made)
				Yes	No	Non-applicable						
		24 a. and immediate reporting of significant observations to the ship masters of other vessels along the shipping route...	24 a. Does the protocol for the marine wildlife observer include protocols for immediate reporting of significant observations to the ship masters of other vessels along the shipping route?	x			Yes	No	Done	Sustainability Specialist	"Baffinland Iron Mines 2021 Annual Report to the Nunavut Impact Review Board" presentation (Page 418-420) (Refer to B-4) Refer to Table 5.1 in the 2022 Marine Shipping and Vessel Management Report (B-18).	
		24 f. as part of the adaptive management program to address any items that require immediate action.	24 f. Is the protocol part of the adaptive management program that addresses any items that require immediate action?	x			Yes	No	Done	Sustainability Specialist	"Baffinland Iron Mines 2021 Annual Report to the Nunavut Impact Review Board" presentation (Page 418-420) (Refer to B-4) Refer to Table 5.1 in the 2022 Marine Shipping and Vessel Management Report (B-18).	
25	171	25 a. The Proponent shall include within its updated Terrestrial Wildlife Management and Monitoring Plan...	25 a. Has Baffinland updated its Terrestrial Wildlife Management and Monitoring plan?	x			Yes	No	Done	Sustainability Specialist	"Terrestrial Environment Mitigation and Monitoring Plan" document, 'Mortality Mitigation' section 3.3.4 (Page 53-55) (refer to B-1)	Interviewed Sustainability Specialist (as part of December 2019 report) - The plan is up to date as it includes all requirements, such as caribou deterrents.
		25 b. ...a commitment to establish deterrents along the Tote Road embankments at any areas where it is determined that caribou are utilizing the embankments or transportation corridors to facilitate movement and where such movement presents a likelihood of caribou mortality to occur.	25 b. Does the Terrestrial Wildlife Management and Monitoring plan include a commitment to establish deterrents along the Tote Road embankments at any areas where it is determined that caribou are utilizing the embankments or transportation corridors to facilitate movement and where such movement presents a likelihood of caribou mortality to occur?	x			Yes	No	Done	Sustainability Specialist	"Terrestrial Environment Mitigation and Monitoring Plan" document, 'Mortality Mitigation' section 3.3.4 (Page 53-55) (refer to B-1)	
26	173	26. The Proponent shall employ best practices and meet all regulatory requirements during all ship-to-shore and other marine-based fuel transfer events.	26. Does Baffinland ensure that it employs best practices and meets all regulatory requirements during all ship-to-shore and other marine-based fuel transfer events?	x			Yes	No	Done	Sustainability Specialist	Refer to p. 540-541 of the 2021 NRB Annual Report (B-4). Refer to the Oil Pollution Emergency Plan - Mine Inlet (OPEP), B-26. Refer to the Spill at Sea Response Plan, B-25. Refer to the Oil Pollution Prevention Plan - Mine Inlet (OPPP), B-27, specifically section 8.1.2. 'Fuel Storage Facilities and Infrastructure.'	
27	174	27 a. The Proponent and the Canadian Coast Guard are required to provide spill response equipment and...	27 a. Does Baffinland and the Canadian Coast Guard provide spill response equipment?	x			No	No	Done	Sustainability Specialist	"Spill at Sea Response Plan" document, 'Spill Response Resources' section 10 (Page 36) (refer to B-25)	Interviewed Sustainability Specialist (as part of December 2019 report) - Baffinland has a Spill at Sea Response Plan (SSRP) and this plan details what assets at site are available for responding to spills. Any reliance on the Canadian Coast Guard would be outlined in that plan, however Baffinland has a contract with a company called CSR (Oil Spill Response Limited) that will provide response assistance if they ever need it during the shipping season. The CCG as part of its own programming may have a cache of equipment in Pond Inlet, however if it's not mentioned in the SSRP it wouldn't be relevant.
		27 b. annual training to Nunavut communities along the shipping route to potentially improve response times in the event of a spill.	27 b. Does Baffinland and the Canadian Coast Guard provide annual training to Nunavut communities along the shipping route?	x			No	No	Done	Manager Community Resources Services	"Baffinland Iron Mines 2021 Annual Report to the Nunavut Impact Review Board" presentation (Pages 558-559) (refer to B-4)	
Total				69	0	18						

Inuit Impact and Benefit Agreement (IIBA) Commitments

Inuit Impact and Benefit Agreement (IBA) Commitments

Name of Auditor:	BDO Canada LLP
Date of Audit:	2022-09-30

Completion Rate:	
Total # of audit questions with evidence provided supporting completion of the audit question	44
Percentage of applicable audit questions with evidence provided supporting completion of the audit question	92%

Concern #	Amended IIBA Article Reference #	Commitment Statement	Audit Question	Evidence Provided			Documented Evidence Changed (Yes or No)	Interview Notes Changed (Yes or No)	Status	Responsible Position	Documented Evidence	Interview Notes (Highlight the cell in Yellow if any changes to the Interview Notes were made)	
				Yes	No	Non-applicable							
1	4.12 Annual IBA Implementation Report		1.a. The Company will prepare the Annual IBA Implementation Report required pursuant to Section 20.3 herein in order to summarize all reports generated in relation to the Project...	1.a. Has Baffinland prepared the Annual IBA Implementation Report required (pursuant to Section 20.3 herein) in order to summarize all reports generated in relation to the Project?	x			Yes	Yes	Done	IBA Reporting Specialist	"IBA Annual Report 2021" (C-10)	
			1.b. Including reports by the Employment Committee and the Contracting Committee...	1.b. Does this include reports by the Employment Committee and the Contracting Committee?	x			Yes	No	Done	IBA Reporting Specialist	"IBA Annual Report 2021" (C-10)	Interviewed IBA Reporting Specialist - Throughout the report the document describes activities that the Employment and Contracting Committees pursued in the Annual Work Plan year.
			1.c. On environmental issues...	1.c. Does this include a report on environmental issues?	x			Yes	No	Done	IBA Reporting Specialist	"IBA Annual Report 2021" (C-10, page 34-37)	Interviewed IBA Reporting Specialist - This report is on the environmental issues as it affects the Inuit.
			1.d. Social and cultural objectives...	1.d. Does this include a report on social and cultural objectives?	x			Yes	Yes	Done	IBA Reporting Specialist	"IBA Annual Report 2021" (C-10, Page 27.33 and throughout document)	The Annual Report includes an overview of social and cultural objectives.
			1.e. Financial provisions and participation...	1.e. Does this include a report on financial provisions and participation?	x			Yes	Yes	Done	IBA Reporting Specialist	"IBA Annual Report 2021" (C-10, Page 3 and "Appendix A")	The Annual Report includes information on financial provisions by Baffinland and participation
			1.f. Inuit training and employment...	1.f. Does this include a report on Inuit training and employment?	x			Yes	Yes	Done	IBA Reporting Specialist	"IBA Annual Report 2021" (C-10, Page 6-23 covers Inuit training and employment)	The Annual Report provides an overview of Inuit Training conducted and achieved in the year.
			1.g. Contracts and economic benefits.	1.g. Does this include a report on contracts and economic benefits?	x			Yes	No	Done	IBA Reporting Specialist	"IBA Annual Report 2021" (C-10, Page 22-24 and throughout document)	Interviewed IBA Reporting Specialist - Throughout the document it describes economic benefits and contract benefits provided to the Inuit.
2	9.2.2 Shipping-related Relations Between QIA and the Company	2. The Company will appoint a senior manager responsible for maritime shipping.	2. Has Baffinland appointed a senior manager responsible for maritime shipping?	x			Yes	No	Done	Sustainability Specialist	"Baffinland Corporate Development" document, Organization chart shows the corporate structure including the Director of Shipping & Sales, Administration, Evaluation and Reporting (refer to C-1)	Interviewed Sustainability Specialist - The Head of Shipping, as indicated on Baffinland's organization structure, is in charge of maritime shipping.	
3	9.2.4	3. The Company and QIA will establish a communications protocol to keep QIA and Inuit in the North Baffin communities and any other communities affected by Project-related maritime shipping, continuously informed about maritime shipping activities related to the Mary River Project.	3. Has Baffinland and QIA established a communications protocol to keep QIA and Inuit in the North Baffin communities and any other communities affected by Project-related maritime shipping, continuously informed about maritime shipping activities related to the Mary River Project?	x			Yes	Yes	Done	Sustainability Specialist	2020 SOP version " 07132020_BIM_SOP_Communications Protocol_Shipping" was modified in 2021 and formally finalized in July 2021 "BAF-PH1-820-PRO-0001-0 - Internal Communications Protocol for Shipping Activities". Specific details on communications included in Section 4 (starts on page 7 of pdf) (refer to A-3)  Refer to p.7 "Communications" in "A-1a and A1 b. 2022 Shipping and Marine Monitoring Summary "	Interviewed Sustainability Specialist - The "Communications Protocol" document is considered a live document as new methods are piloted (e.g. new as of July 2020 Baffinland has a dedicated Facebook Baffinland Shipping Page).  Manager, Community Resource Services (Sept 2021) Document will continue to be updated as needed. Elements are shared as part of shipping meetings held with MHTO/Hamlet and communicated through annual Shipping Season fact sheets.  Manager, Community Resource Services (Feb 2022) 2021 protocol was applied throughout 2021.  Sustainability specialist/Manager, Community Resource Services (Sept 2022).  Communications are discussed annually at the end of season and pre-season shipping meetings. Powerpoint slides were shared with MHTO on July 7, 2022, as an in-person meeting could not be coordinated despite multiple attempts by BIM. No comments were received from MHTO indicating any desired modifications to the current communications approach including during June 2022 MEWG meetings.	
4	9.2.5	4. The Company shall provide QIA and Inuit in the North Baffin communities and in other communities affected by Project-related maritime shipping, ship tracking information to ensure Inuit have knowledge of ship positions and paths and ship traffic in general in Foxe Basin and Hudson Strait.	4. Has Baffinland provided QIA and Inuit in the North Baffin communities and in other communities affected by Project-related maritime shipping, ship tracking information to ensure Inuit have knowledge of ship positions and paths and ship traffic in general in Foxe Basin and Hudson Strait?	x			Yes	Yes	Done	Sustainability Specialist	2020 SOP version " 07132020_BIM_SOP_Communications Protocol_Shipping" was modified in 2021 and formally finalized in July 2021 "BAF-PH1-820-PRO-0001-0 - Internal Communications Protocol for Shipping Activities". Specific details on communications included in Section 4 (starts on page 7 of pdf) (refer to A-3)  Refer to "Communications" section, page 7, in "Shipping and Marine Monitoring Summary - 2022 Shipping Season" (refer to A-1a and A-1b). This summary, all vessel locations, and additional information pertaining to 2022 shipping communications can be found at: <a href="https://www.baffinland.com/operation/shipping-and-monitoring/">https://www.baffinland.com/operation/shipping-and-monitoring/</a>  The above link includes contact information for community-based Baffinland shipping monitors in Pond Inlet, VHF radio contact information for personnel on the water (channel 26), 24 hour live vessel locations, as well as details for the Baffinland Shipping Facebook account, where daily posts are made.  Powerpoint slides were shared with MHTO on July 7, 2022, as an in-person meeting was declined (refer to A-4 2021 MHTO End of Shipping 2022 Start of Shipping Meeting) slides. A shipping communications summary for 2021 was provided on slide 10. The Communications Protocol for the 2022 season is outlined on slides 27-32.	Interviewed Sustainability Specialist - Updated to include newest webpage with live vessel tracking (included in documented evidence column).  Manager, Community Resource Services (Sept 2021) 2021, new updates were made to the 2020 communication protocol to better define roles and responsibilities for the 2021 shipping season. Shipping fact sheets are updated yearly. Meetings with MHTO and Hamlet provides an overview of communication methods and opportunities for feedback.  Sustainability specialist/Manager, Community Resource Services (Sept 2022).  Communications are discussed annually at the end of season and pre-season shipping meetings. Powerpoint slides were shared with MHTO on July 7, 2022, as an in-person meeting could not be coordinated despite multiple attempts by BIM. No comments were received from MHTO indicating any desired modifications to the current communications approach including during June 2022 MEWG meetings.	
		5.a. The Company shall keep QIA informed of the following information regarding shipping during all phases of the Project: For Vessels and Vessel Traffic:	5.a. Has Baffinland kept QIA informed of the following information regarding shipping during all phases of the Project? The following conditions are specific to vessels and vessel traffic:	x			Yes	No	Done	Sustainability Specialist	Refer to p. 327-349 of the 2021 NIBB Annual Report (B-4), "Site Activities Completed in 2021" section 3.1 (Page 29)		
		5.b. Type of Vessel(s):	5.b. Type of Vessel(s)?	x			Yes	No	Done	Sustainability Specialist	Refer to p. 327-349 of the 2021 NIBB Annual Report (B-4), "Site Activities Completed in 2021" section 3.1 (Page 29)		

Inuit Impact and Benefit Agreement (IIBA) Commitments

Name of Auditor:	BDO Canada LLP
Date of Audit:	2022-09-30

Completion Rate:	
Total # of audit questions with evidence provided supporting completion of the audit question	44
Percentage of applicable audit questions with evidence provided supporting completion of the audit question	92%

Concern #	Amended IIBA Article Reference #	Commitment Statement	Audit Question	Evidence Provided			Documented Evidence Changed (Yes or No)	Interview Notes Changed (Yes or No)	Status	Responsible Position	Documented Evidence	Interview Notes (Highlight the cell in Yellow if any changes to the Interview Notes were made)
				Yes	No	Not applicable						
5	9.3 Communication of Shipping Requirements for the Project	5.c. Nature of cargo(s):	5.c. Nature of cargo(s)?	x			Yes	No	Done	Sustainability Specialist	Refer to p. 327-349 of the 2021 NIIB Annual Report (B-4), 'Site Activities Completed in 2021' section 3.1 (Page 29).	
		5.d. Development of the MTMP, procedure for review, updates and amendment:	5.d. Development of the MTMP, procedure for review, updates and amendment?		x						N/A - not started	
		5.e. Standards for on-board communications and navigation equipment and procedures including ability to communicate with the Mine/Port Site:	5.e. Standards for on-board communications and navigation equipment and procedures including ability to communicate with the Mine/Port Site?	x			Yes	No	Done	Sustainability Specialist / Manager Community Resource Services	Refer to page 9, section 2 Navigation, 2022 Standing Instructions and General Information for Masters of Vessels Loading at Milne Inlet Port (SITM), B-16.	
		5.f. Procedures to address Vessel traffic safety, including safety of small boat traffic along the shipping route:	5.f. Procedures to address Vessel traffic safety, including safety of small boat traffic along the shipping route?	x			Yes	Yes	Done	Sustainability Specialist / Manager Community Resource Services	2020 SOP version "07132020_BMA_SOP_Communications Protocol_Shipping" was modified in 2021 and formally finalized in July 2021. NIIB-401-422-962-0201-00 - Internal Communications Protocol for Shipping Activities". Specific details on communications included in Section 4 (starts on page 7 of pdf) (refer to A-3). Refer to p. 7 "Communications" in "A-1a and A1-b 2022 Shipping and Marine Monitoring Summary". Pre-workshop slides were shared with MHTO on July 7, 2022. (refer to A.4 2021 MHTO End of Shipping, 2022 Start of Shipping Meeting) slides. A shipping communications summary for 2021 was provided on slide 10. The Communications Protocol for the 2022 season is outlined on slides 27-32. Refer to page 9, section 2 Navigation, 2022 Standing Instructions and General Information for Masters of Vessels Loading at Milne Inlet Port (SITM), B-16.	Interviewed Sustainability Specialist (in part of December 2019 report) - VHF notification provides live alerts and communication to boaters on waters regarding the location of carriers along the shipping routes, allowing them to plan their travel routes accordingly. Manager, Community Resource Services (Sept 2021) - shipping monitors will again be hired in 2021 to provide live updates on incoming/outgoing vessels on VHF radio. Manager, Community Resource Services (Feb 2022) - 10 shipping monitors were hired in 2021 to work from the Baffinland office in order to track vessels, provide live updates on incoming/outgoing vessels on VHF radio, Facebook, etc. Sustainability specialist/Manager, Community Resource Services (Sept 2022) Up to 10 shipping monitor positions were created in 2022 in advance of the shipping season to cover up to 10 positions. Start date was July 4, 2022. No comments were received from MHTO indicating any desired modifications to the current communications approach.
		5.g. Hydrographic charting and placement of navigational aids along the shipping route:	5.g. Hydrographic charting and placement of navigational aids along the shipping route?	x			Yes	Yes	Done	Sustainability Specialist / Manager Community Resource Services	Refer to page 9, section 2 Navigation, 2022 Standing Instructions and General Information for Masters of Vessels Loading at Milne Inlet Port (SITM), B-16.	Sustainability specialist/Manager, Community Resource Services (Sept 2022) Standing Instructions to Masters are updated annually to incorporate the newest management and mitigation measures.
		5.h. Application of the Arctic Ice Regime Shipping System (AIRSS) to Vessels transiting:	5.h. Application of the Arctic Ice Regime Shipping System (AIRSS) to Vessels transiting?	x			Yes	No	Done	Sustainability Specialist	Refer to Appendix 1 of the 2022 NIIB Marine Shipping and Vessel Management Report for the 2022 Shipping and Marine Wildlife Management Plan (B-18), Section 4.1 (p. 17) and Appendix 8, Sections B.1.4, B.1.4 (p. 51), B.1.7 (p. 51).	
		5.i. Ballast water management procedures to be used by Vessels transiting along the shipping route:	5.i. Ballast water management procedures to be used by Vessels transiting along the shipping route?	x			No	No	Done	Sustainability Specialist	"Ballast Water Management Plan" document, "Regulatory Framework" section 1.5 (Page 6) & "Ballast Water Management" section 2 (Page 9) (refer to B-4)	
		5.j. Ice classification for Vessels:	5.j. Ice classification for Vessels?	x			Yes	No	Done	Sustainability Specialist	NEW "Shipping and Marine Wildlife Management Plan" Section 4.1 (p. 16) and Section 5.2.3, & 5.2.4 (pp. 26-28) (Refer to C-6)	
		5.k. Identification of shipping route and process for changes to the route:	5.k. Identification of shipping route and process for changes to the route?	x			No	Yes	Done	Manager Community Resource Services	Refer to A.4 2021 MHTO End of Shipping, 2022 Start of Shipping Meeting for slides shared with MHTO for shipping route on slide 40 (PDF pg. 20)	Manager, Community Resource Services (Sept 2021) - Baffinland regularly engages with the MHTO/Hamlet/QIA to share latest information on upcoming shipping season's activities and to obtain feedback on communication methods, etc. As part of 2020 meetings, a request was made to change the shipping route slightly near Bruce Head. Baffinland has since implemented this slight deviation since 2020 shipping season. Sustainability specialist/Manager, Community Resource Services (Sept 2022) No changes made in shipping route since 2020 shipping season.

Inuit Impact and Benefit Agreement (IIBA) Commitments

Name of Auditor:	BDO Canada LLP
Date of Audit:	2022-09-30

Completion Rate:	
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Percentage of applicable audit questions with evidence provided supporting completion of the audit question	92%

Concern #	Amended IIBA Article Reference #	Commitment Statement	Audit Question	Evidence Provided			Documented Evidence Changed (Yes or No)	Interview Notes Changed (Yes or No)	Status	Responsible Position	Documented Evidence	Interview Notes (Highlight the cell in Yellow if any changes to the Interview Notes were made)
				Yes	No	Not applicable						
		5.l. Process and procedures for public consultation and for public notification with respect to Vessel transit?	5.l. Process and procedures for public consultation and for public notification with respect to Vessel transit?	x			Yes	Yes	Done	Manager, Community Resource Services	<p>2020 SOP version " 07132020_BRM_SOP_Communications Protocol_Shipping" was modified in 2021 and formally finalized in July 2021 "BAM 041-020-902-0001-05- Internal Communications Protocol for Shipping Activities". Specific details on communications included in Section 4 (starts on page 7 of pdf) (refer to A.3)</p> <p>Refer to A.5 for the 2022 Rolling Shipping Schedule. The most recent email communication was sent August 22nd, 2022, which included a tentative schedule up until September 2nd outlining estimated times at berth and estimated times of departure for each proposed vessel</p> <p>Refer to "Communications" Section, page 7, in "A_1_Shipping and Marine Monitoring Summary - 2022 Shipping Season" (refer to A.1).</p> <p>The above link includes contact information for community-based Baffinland shipping monitors in Pond Inlet, VHF radio contact information for personnel on the water (channel 26), as well as details for the Baffinland Shipping Facebook account, where daily posts are made.</p> <p>Details pertaining to this radio show can be found in Section 4.2 of the 2022 Marine Shipping and Vessel Management Report (refer to B-18).</p>	<p>Manager, Community Resource Services (Sept 2021): Baffinland regularly engages with the MHTO/Hamlet/QIA to share latest information on upcoming shipping season's activities and to obtain feedback on communication methods, seasonal activities, etc. As part of the May 26, 2021 meeting, Baffinland presented its proposed approach to start of icebreaking (modified approach from 2020 by proposing to break ice only once there was a continuing path of &lt;9/10, rather than only waiting for confirmation that there is no more landfast ice and floe edge closure). By the time the shipping season began in late July 2021, due to concerns voiced by community, Baffinland agreed to avoid icebreaking entirely at the start of the season, and this would wait until ice concentrations were no greater than 3/10ths along the shipping route.</p> <p>Manager, Community Resource Services (Feb 2022): Baffinland did not engage in any icebreaking at the start or end of the shipping season using an icebreaker.</p> <p>Sustainability specialist/Manager, Community Resource Services (Sept 2022):</p> <p>Vessel schedules sent in advance of start of season and throughout season. Also regularly through Rolling Shipping Schedule including a tentative schedule outlining estimated times at berth and estimated times of departure for each proposed vessel.</p> <p>All vessel locations, and additional information pertaining to 2022 shipping communications can be found at: <a href="https://www.baffinland.com/operation/shipping-and-monitoring/">https://www.baffinland.com/operation/shipping-and-monitoring/</a></p> <p>The above link includes contact information for community-based Baffinland shipping monitors in Pond Inlet, VHF radio contact information for personnel on the water (channel 26), as well as details for the Baffinland Shipping Facebook account, where daily posts are made.</p> <p>A radio show was also held on July 13th, 2022 in Pond Inlet to provide information to community on past and upcoming shipping seasons and to obtain feedback.</p>
		5.m. Vessel requirements for pollution control, including bilge discharges, sewage and garbage?	5.m. Vessel requirements for pollution control, including bilge discharges, sewage and garbage?	x			Yes	No	Done	Sustainability Specialist / Manager, Community Resource Services	<p>Refer to Appendix 1 of the 2022 NRB Marine Shipping and Vessel Management Report for the 2022 Shipping and Marine Wildlife Management Plan (B-18).</p> <p>Refer to Section 6.3, p. 78-79, 'Onboard Waste Management' of Appendix 1 in B-18.</p>	
		5.n. Requirements with respect to Oil Pollution Emergency Plans (OPEP) under the Canada Shipping Act?	5.n. Requirements with respect to Oil Pollution Emergency Plans (OPEP) under the Canada Shipping Act?	x			No	No	Done	Sustainability Specialist	<p>"Oil Pollution Emergency Plan-Mline Inlet (OPEP)" document, "Oil Handling Facility Declaration" section (Page 9) (refer to B-26)</p>	<p>Interviewed Sustainability Specialist - This OPEP document was updated May 2020</p>

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				Yes	No	Non-applicable						
5 (cont'd)	9.3 Communication of Shipping Requirements for the Project (cont'd)	5.o. Identification of locations for emergency anchorages	5.o. Identification of locations for emergency anchorages?	x			Yes	No	Done	Sustainability Specialist	Refer to page 11 of B-16 for anchorage locations- 2022 Standing Instructions and General Information for Masters of Vessels Loading at Milne Inlet Port (SITM). Refer to Figure 3.1, p. 12 and Section 3 'ANCHORING AND DRIFTING AREAS' in the 2022 NRB Marine Shipping and Vessel Management Report (B-16).	Interviewed Sustainability Specialist (as part of December 2019 report) - Since emergency anchorage only affects hunters (i.e. communities), we have raised directly with the impacted parties, whom the CIA is set up to represent.
		5.p. Procedures for dealing with anticipated unusual Vessel traffic, including towing arrays; and	5.p. Procedures for dealing with anticipated unusual Vessel traffic, including towing arrays?		x		No	No	Done	Sustainability Specialist	N/A, not started	
		5.q. Procedures for shipping requirements for any construction after commencement of Commercial Production	5.q. Procedures for shipping requirements for any construction after commencement of Commercial Production?	x			Yes	Yes	Done	Sustainability Specialist	Powerpoint slides were shared through MDWG update meetings, held in June 2022 and with MRO on July 7, 2022 (refer to A-4 2021 MRO End of Shipping, 2022 Start of Shipping Meeting) slides. Slides. Refer to 2022 Standing Instructions and General Information for Masters of Vessels Loading at Milne Inlet Port (SITM), B-16.	Interviewed Sustainability Specialist (as part of June 2019 report) - There are no separate requirements for Construction material shipping outside of the defined "construction period". These vessels still have to follow all operational requirements (for example, speed limit of 9 knots etc.). Sustainability specialist/Manager, Community Resource Services (Sept 2022). Vessel schedules sent in advance of start of season and throughout season. Also regularly through Rolling Shipping Schedule including a tentative schedule outlining estimated times at berth and estimated times of departure for each proposed vessel. All vessel locations, and additional information pertaining to 2022 shipping communications can be found at: <a href="https://www.baffinland.com/operation/shipping-and-monitoring">https://www.baffinland.com/operation/shipping-and-monitoring</a> The above link includes contact information for community based Baffinland shipping monitors in Pond Inlet, VHF radio contact information for personnel on the water (channel 26), as well as details for the Baffinland Shipping Facebook account, where daily posts are made.
6	9.4 Shipping Monitoring	6.a. The Company in consultation with QIA will facilitate and pay for training for Inuit ship monitors...	6.a. Has Baffinland, in consultation with QIA, facilitated and paid for training for Inuit ship monitors			x	Yes	Yes	Done	Sustainability Specialist / Manager / Community Resource Services	"Ship-Based Observer Program - Training Manual" document, which is Appendix A (Page 79) of the "2019 Shipboard Observer Program Report" document, which describes the training process during non-COVID-19 restrictions. (refer to C-2) Refer to the SBO Training Manual (B-19), which will be used for training Inuit shipboard monitors in the fall of 2022.	Interviewed Sustainability Specialist - Costs for training are exclusively paid for by Baffinland. No program in 2020 due to COVID-19 pandemic onboarding restrictions. Manager, Community Resource Services(2022); No program in 2021 due to COVID-19 pandemic boarding restrictions Sustainability specialist/Manager, Community Resource Services (Sept 2022): Training and hiring of Inuit shipboard monitors required for Fall 2022.
		6.b. and to the extent such individuals are available for employment will hire trained Inuit to act as monitors.	6.b. If such individuals are available for employment does Baffinland hire trained Inuit to act as monitors?			x	Yes	Yes	Done	Sustainability Specialist / Manager / Community Resource Services	"Ship-Based Observer Program - Training Manual" document, which is Appendix A (Page 79) of the "2019 Shipboard Observer Program Report" document, which describes the training process during non-COVID-19 restrictions. (refer to C-2) Refer to the SBO Training Manual (B-19), which will be used for training Inuit shipboard monitors in the fall of 2022.	Interviewed Sustainability specialist - Baffinland employs the Inuit ship monitors subsequent to the completion of the course. No program in 2020 due to COVID-19 pandemic onboarding restrictions. Manager, Community Resource Services(2022); No program in 2021 due to COVID-19 pandemic boarding restrictions Sustainability specialist/Manager, Community Resource Services (Sept 2022): Training and hiring of Inuit shipboard monitors required for Fall 2022.
		6.b. Inuit monitors on behalf of the Company and QIA will act as monitors on project related voyages that pose a significant environmental risk as agreed to by the Parties.	6.b. Have Inuit monitors, on behalf of Baffinland and QIA, acted as monitors on project related voyages that pose a significant environmental risk as agreed to by the Parties?			x	Yes	Yes	Done	Sustainability Specialist / IIBA Compliance Lead	"2019 Ship-Based Observer Program" document (July 2020 version), "MWO Training" section 1.3 (Page 19) (refer to C-2) Refer to the SBO Training Manual (B-19), which will be used for training Inuit shipboard monitors in the fall of 2022. Refer to A-30 SBO Program Methods for additional information pertaining to the SBO program, which was last completed in 2019 and will be reintroduced in 2022.	Interviewed Sustainability Specialist - The individuals are located on vessels such as ice breakers which would pose a higher environmental risk. Also, the individuals are monitoring at the beginning and the end of the shipping season, which represent ice periods which are environmentally riskier and this limiting was agreed to by QIA. The program was repeated in 2019 and was reported on in the 2019 annual monitoring report, which was issued in May 2020. IIBA Compliance Lead (March 2022) Recommend that this be changed to N/A as this was not possible due to boarding restrictions related to COVID-19 pandemic. BIM was in compliance prior to 2020. Note that in 2021, Baffinland did not break ice which is typically the period over which shipping monitors would be placed on during a period with higher significant environmental risk. Sustainability specialist/Manager, Community Resource Services (Sept 2022); Baffinland has hired two Inuit shipboard monitors for the 2022 SBO program.
		6.c. In the event Inuit monitors are unavailable and if required as a continuing condition of the NRB "Project Certificate", the Company will still ensure that ship monitors are present on voyages that pose a significant environmental risk.	6.c. In the event Inuit monitors are unavailable and if required as a continuing condition of the NRB "Project Certificate", has Baffinland ensured that ship monitors are present on voyages that pose a significant environmental risk?	x			Yes	No	Done	Sustainability Specialist / Manager / Community Resource Services	Ship-based observers could not board icebreaker as done previously in 2018-2019. As an alternative, incidental marine mammal monitoring program was established in collaboration with MMON. (refer to C-14) Refer to the SBO Training Manual (B-19), which will be used for training Inuit shipboard monitors in the fall of 2022. Refer to A-30 SBO Program Methods for additional information pertaining to the SBO program, which was last completed in 2019 and will be reintroduced in 2022.	Interviewed Sustainability Specialist - The individuals are located on vessels such as ice breakers which would pose a higher environmental risk. Also, the individuals are monitoring at the beginning and the end of the shipping season, which represent ice periods which are environmentally riskier and this limiting was agreed to by QIA. The program was repeated in 2019 and was reported on in the 2019 annual monitoring report, which was issued in May 2020. Manager, Community Resource Services(Sept 2021/Feb 2022); MMON program was initiated in 2020 and is continuing into 2021.
		6.d. The intent of establishing monitoring stations under Subsection 13.3.2 will be to complement or potentially substitute for the need for ship monitors. The Joint Executive Committee will periodically assess the effectiveness of ship monitoring and other monitoring methods as the Project evolves.	6.d. Has the Joint Executive Committee periodically assessed the effectiveness of ship monitoring and other monitoring methods as the Project evolves?	x			No	No	Done	IIBA Reporting Specialist	IIBA Annual Report to the JEC (Page 12-13)	Interviewed IIBA Reporting Specialist (as part of December 2019 report) - JEC discussed shipping related concerns and the effectiveness of ship monitoring prior to December 31, 2019.
7	9.4.4	7.a. Shipping monitors shall prepare a written report of their activities after each voyage and summarize the Year's activity.	7.a. Did shipping monitors prepare a written report of their activities after each voyage and summarize the year's activity?			x	No	No	Done	Sustainability Specialist	"2019 Ship-Based Observer Program" document (July 2020 version), "Executive Summary" (Page 3) (refer to C-2)	Interviewed Sustainability Specialist - The shipboard observer program was repeated in 2019 and was reported on in the 2019 annual monitoring report, which was issued in May 2020. Therefore, the 2019 program report is the most recent and relevant evidence as of June 30, 2022.

Inuit Impact and Benefit Agreement (IIBA) Commitments

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		7. The reports shall be delivered to the Joint Executive Committee and included in the Annual IIBA Implementation Report.	7.b. Were the reports delivered to the Joint Executive Committee and included in the Annual IIBA Implementation Report?			x	No	No	Done	Sustainability Specialist	"2019 Shipboard Observer Program Report" document, "Executive Summary" (Page 4) (refer to C.2).	Interviewed Sustainability Specialist - The shipping and environmental monitors are not Baffinland employees and do not report directly to Baffinland, which results in Baffinland being at the mercy of their submission to be able to include it Baffinland's annual IIBA reporting and to the J.E.C. Baffinland received the shipping and environmental monitors' report in May 2020, which was past the annual IIBA and J.E.C report issued date of March 31, 2020. Since the timing of the report is out of Baffinland's control, this Audit Question has been determined to be N/A. Program not operating in 2021 due to Covid restrictions. SBO program will run in October 2022 for two weeks.

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				Yes	No	Not applicable							
8	9.6.4	8. The Company will ensure that all safety, spill response and operational plans and mitigation measures acknowledge, respect and protect the relationship of Inuit to the sea, sea ice and marine resources, including the rights of Inuit pursuant to Subsection 5.7.16 and subject to limitations on such rights set out in the NLCA, including Sections 5.7.17, 5.7.18 and 5.7.25 when considering the operational needs of the Project.	8. Has Baffinland ensured that all safety, spill response and operational plans and mitigation measures acknowledge, respect and protect the relationship of Inuit to the sea, sea ice and marine resources, including the rights of Inuit pursuant to Subsection 5.7.16 and subject to limitations on such rights set out in the NLCA, including Sections 5.7.17, 5.7.18 and 5.7.25 when considering the operational needs of the Project?	x			No	No	Done	Sustainability Specialist	NEW "Shipping and Marine Wildlife Management Plan" document, "Culture, Resources, and Land Use" section 4.5.1 (Page 39) (refer to C-6) & "Spill at Sea Response Plan" document, "Environmental Information" Appendix 4 (Page 136) (refer to B.2)	PDW IIBA Compliance Lead (March 2022): Baffinland's Shipping and Marine Wildlife Management Plan (C-6) provides details on all of the various types of information that were considered in order to incorporate safety, spill response operational plans and mitigation measures. Inuit are able to travel safely and pursue harvesting activities throughout the shipping season as Baffinland has put in place measures to avoid and modify its activities in consideration of ecological factors and Inuit activities (e.g., shipping no-go zones based on hunting areas and ecological significance as identified by Inuit Traditional Knowledge) all while allowing Baffinland navigation to and from Milne Port.  Section 3 Emergency Management and Response (C-6) discusses spill prevention and management.  Section 4 and 5 describes shipping mitigation and management measures related to various commitments and ecological, land use and harvesting considerations. Specifically, Section 5.3 describes how the various community, environmental and ecological factors were taken into consideration.  As a whole Section 6 describes all of the various procedures put in place describes how Baffinland shares information about its activities so that Inuit may participate in their vessel activities and travel safely (Section 6.5.1). The hiring of shipping monitors in the community allows for any issues that may be in conflict with harvesting activities to be reported to the shipping monitors. In addition, the use of vessel tracking software tool to monitor vessel compliance (e.g., adherence to specific vessel speeds, shipping route, avoidance of no-go zones) aims to ensure Inuit are able to travel safely in the area and harvest.	
9	14.3 Annual Project Review Forum	9. The Parties agree to hold an Annual Project Review Forum (referred to in this Article 14 as the "Forum") at which QIA and the Company shall discuss Project related issues directly with members from impacted communities.	9. Did the Parties hold an Annual Project Review Forum (referred to in this Article 14 as the "Forum") at which QIA and Baffinland discussed Project related issues directly with members from impacted communities?			x	No	Yes	Done	IIBA Reporting Specialist	"2019 Annual Project Review Forum Report" document, "Community Comments, Recommendations and Next Steps" (Page 7-16) C-5-2019 APRF Report CLEAN LNG V1 2020 & 2021 Annual Project Review Forum impacted by Covid-19.  Plans are underway to host APRF in 2022.	IIBA Compliance Lead (March 2022): APRF has not been held due to COVID restrictions on gatherings in the communities for 2020 and 2021. Plans to hold in 2022. Most recent document would be 2019.	
10	15.2 Mitigation and Monitoring	10.a. The Company will implement all mitigation measures or monitoring provisions, including those identified in the Final ES and required by NREB under the NREB Project Certificate(s).	10.a. Has Baffinland implemented all mitigation measures or monitoring provisions, including those identified in the Final ES and required by NREB under the NREB Project Certificate(s)?	x			Yes	No	Done	Sustainability Specialist	"Summary of 2021 Compliance with Conditions" document & "Baffinland Iron Mines 2021 Annual Report to the Nunavut Impact Review Board" presentation, "Summary of 2021 Compliance with Conditions" section 4.3 (Page 58) (B-4).	Interviewed IIBA Reporting Specialist. Baffinland is only partially compliant as not all mitigation measures have been implemented, therefore evidence provided does not support the completion of the Audit Question.	
		10.b. and other mitigation measures and monitoring provisions developed by the Company from time to time through the Environmental, Health and Safety Management System ("EHS System").	10.b. Have other mitigation measures and monitoring provisions developed by Baffinland from time to time through the Environmental, Health and Safety Management System ("EHS System")?	x			Yes	No	Done	Sustainability Specialist	Refer to the 2021 NREB Annual Report (B-4), p. 47-48, 66-68, 81-82, 95, 107-108, 130-131, 152-153, 173-174, 222-223, 245-248, 305, 415-417, 436, 460-461, 473, 486-488, 500, 510-512, 525, 528, 534, 549.		
		10.c. Project monitoring programs will evaluate the accuracy of the project impact predictions and significance determinations including assessments of the efficacy of all mitigation measures.	10.c.1. Does the project monitoring programme evaluate the accuracy of the project impact predictions?	x			Yes	No	Done	Done	Sustainability Specialist	Refer to the 2021 NREB Annual Report (B-4), p. 47-48, 66-68, 81-82, 95, 107-108, 130-131, 152-153, 173-174, 222-223, 245-248, 305, 415-417, 436, 460-461, 473, 486-488, 500, 510-512, 525, 528, 534, 549.	
		10.c.2. Does the project monitoring programme evaluate the significance determinations, including assessment of the efficacy of all mitigation measures?	10.c.2. Does the project monitoring programme evaluate the significance determinations, including assessment of the efficacy of all mitigation measures?	x			Yes	No	Done	Sustainability Specialist	Refer to the 2021 NREB Annual Report (B-4), p. 47-48, 66-68, 81-82, 95, 107-108, 130-131, 152-153, 173-174, 222-223, 245-248, 305, 415-417, 436, 460-461, 473, 486-488, 500, 510-512, 525, 528, 534, 549.		
11	15.3.4 EHS System	As part of the EHS System the Company agrees to undertake a series of monitoring programs on a continuous basis for the following purposes:	As part of the Baffinland EHS System, is there a series of monitoring programs on a continuous basis for the following purposes:	x			Yes	No	Done	Sustainability Specialist	Refer to the 2021 NREB Annual Report (B-4), p. 47-48, 66-68, 81-82, 95, 107-108, 130-131, 152-153, 173-174, 222-223, 245-248, 305, 415-417, 436, 460-461, 473, 486-488, 500, 510-512, 525, 528, 534, 549.		
		11.a. To supplement the baseline data.	11.a. To supplement the baseline data?	x			Yes	No	Done	Sustainability Specialist	Refer to the 2021 NREB Annual Report (B-4), p. 47-48, 66-68, 81-82, 95, 107-108, 130-131, 152-153, 173-174, 222-223, 245-248, 305, 415-417, 436, 460-461, 473, 486-488, 500, 510-512, 525, 528, 534, 549.		
		11.b. To comply with environmental, regulatory and contractual requirements.	11.b. To comply with environmental, regulatory and contractual requirements?	x			Yes	No	Done	Done	Sustainability Specialist	Refer to the 2021 NREB Annual Report (B-4), p. 47-48, 66-68, 81-82, 95, 107-108, 130-131, 152-153, 173-174, 222-223, 245-248, 305, 415-417, 436, 460-461, 473, 486-488, 500, 510-512, 525, 528, 534, 549.	
		11.c. To validate the predictions relating to the potential effects.	11.c. To validate the predictions relating to the potential effects?	x			Yes	No	Done	Done	Sustainability Specialist	Refer to the 2021 NREB Annual Report (B-4), p. 47-48, 66-68, 81-82, 95, 107-108, 130-131, 152-153, 173-174, 222-223, 245-248, 305, 415-417, 436, 460-461, 473, 486-488, 500, 510-512, 525, 528, 534, 549.	
		11.d. To improve management plans.	11.d. To improve management plans.	x			Yes	No	Done	Done	Sustainability Specialist	Refer to the 2021 NREB Annual Report (B-4), p. 47-48, 66-68, 81-82, 95, 107-108, 130-131, 152-153, 173-174, 222-223, 245-248, 305, 415-417, 436, 460-461, 473, 486-488, 500, 510-512, 525, 528, 534, 549.	
		11.e. To support and refine adaptive management processes and procedures; and	11.e. To support and refine adaptive management processes and procedures?	x			Yes	No	Done	Done	Sustainability Specialist	Refer to the 2021 NREB Annual Report (B-4), p. 47-48, 66-68, 81-82, 95, 107-108, 130-131, 152-153, 173-174, 222-223, 245-248, 305, 415-417, 436, 460-461, 473, 486-488, 500, 510-512, 525, 528, 534, 549.	
		11.f. To address new or additional issues identified and agreed to by the Parties from time to time.	11.f. To address new or additional issues identified and agreed to by the Parties from time to time?	x			Yes	No	Done	Done	Sustainability Specialist	Refer to the 2021 NREB Annual Report (B-4), p. 47-48, 66-68, 81-82, 95, 107-108, 130-131, 152-153, 173-174, 222-223, 245-248, 305, 415-417, 436, 460-461, 473, 486-488, 500, 510-512, 525, 528, 534, 549.	

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12	15.6.2 Final EIS Impact Projections - Different or Greater Significance of Foreseen Impacts	12.a. If the collection and use of Inuit Qaujimatuaqangit on the results of any monitoring programs, including the EHS System, reasonably demonstrates that the significance of residual adverse impacts foreseen by the Final EIS Impact Projections are determined to be significant and materially greater than described in the Final EIS...	12.a. Has the collection and use of Inuit Qaujimatuaqangit or the results of any monitoring programs, including the EHS System, reasonably demonstrated that the significance of residual adverse impacts foreseen by the Final EIS Impact Projections are determined to be significant and materially greater than described in the Final EIS?	x			Yes	No	Done	Sustainability Specialist	Refer to the 2021 NIIB Annual Report (B-4), p. 47-48, 66-68, 81-82, 95, 107-108, 130-131, 152-153, 173-174, 222-223, 245-248, 305, 415-417, 436, 460-461, 473, 486-488, 500, 510-512, 525, 528, 534, 549.	
		12.b. (When the Company shall carry out appropriate measures as contained in the EHS System.	12.b. If so, did Baffinland carry out appropriate measures as contained in the EHS System?	x			Yes	No	Done	Sustainability Specialist	Refer to the 2021 NIIB Annual Report (B-4), p. 47-48, 66-68, 81-82, 95, 107-108, 130-131, 152-153, 173-174, 222-223, 245-248, 305, 415-417, 436, 460-461, 473, 486-488, 500, 510-512, 525, 528, 534, 549.	
		12.c. These measures will be reviewed by the Forum pursuant to Article 14 and by the Joint Executive Committee pursuant to Section 14.14.	12.c. Have these measures been reviewed by the Forum pursuant to Article 14 and by the Joint Executive Committee pursuant to Section 14.14?			x		No	Yes	Done	Environmental Assessment Specialist	2019 Inuit Impact and Benefit Agreement (IIBA) Annual Implementation Report" document, "Engagement Highlights" section (Page 43)
13	15.8 Environmental Monitors	13.a. The Company shall pay QIA the cost to fund a full-time presence on site for Environmental Monitors to be appointed and employed solely by QIA...	13.a. Has Baffinland paid QIA the cost to fund a full-time presence on site for Environmental Monitors to be appointed and employed solely by QIA?	x			No	No	Done	Environmental Assessment Specialist	"Environmental Monitor Operating Procedures Manual" document, "Description of the IBA & Environmental Monitor Commitment" (Page 41(C-1))	Interviewed IBA Reporting Specialist (as part of June 2019 report) - Baffinland funds QIA's costs to hire and employ staff (Environmental Monitor) working on site.
		13.b. who shall be in attendance on site at the Project...	13.b. Are the Environmental Monitors in attendance on site at the Project provide written reports to QIA and Baffinland?			x	No	No	Done	Environmental Assessment Specialist	N/A	Interviewed IBA Reporting Specialist - These employees are employed by QIA and not Baffinland, therefore they report directly to QIA and Baffinland does not have reports available for this audit.
		13.c. and provide written reports to QIA and the Company	13.c. Do they provide written reports to QIA and Baffinland?			x	No	No	Done	Environmental Assessment Specialist	N/A	Interviewed IBA Reporting Specialist - These employees are employed by QIA and not Baffinland, therefore they report directly to QIA and Baffinland does not have reports available for this audit.

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13 (cont'd)	15.8 Environmental Monitor (cont'd)	13.b. The Environmental Monitors shall attend the Project site with a copy of all environmental approval conditions, including any applicable NRB project certificate conditions...	13.d. Have the Environmental Monitors attended the Project site with a copy of all environmental approval conditions, including any applicable NRB project certificate conditions?	x			No	No	Done	Environmental Assessment Specialist	"Environmental Monitor Operating Procedures Manual" document, "Description of the IBA & Environmental Monitor Commitment" (Page 7 and 8) (C-7)	Interviewed IBA Reporting Specialist (as part of June 2019 report) - Baffinland has made all materials available to on-site Environmental Monitors as part of their on-boarding
		13.e. and shall work with representatives of the Company's environmental department to, inter alia, ensure the proper and adequate implementation of all management and monitoring plans specific to the physical environment.	13.e. Do Environmental Monitors work with representatives of the Baffinland's environmental department to, inter alia, ensure the proper and adequate implementation of all management and monitoring plans specific to the physical environment?	x			No	No	Done	Environmental Assessment Specialist	"Environmental Monitor Operating Procedures Manual" document, "Description of the IBA & Environmental Monitor Commitment" (Page 7 and 8) (C-7)	
14	15.10 regulatory Affairs	14.a. The Company will comply with all regulatory requirements associated with the Project, as described in their Sustainability Policy...	14.a. Has Baffinland complied with all regulatory requirements associated with the Project as described in their Sustainability Policy?	x			Yes	No	Done	Sustainability Specialist	"Baffinland Iron Mines 2021 Annual Report to the Nunavut Impact Review Board" presentation, "Performance on Compliance with Regulatory Instruments" section 4.5 (Page 60) (B-4)	
		14.b. Including but not limited to the NRB Project Certificate...	14.b. Has Baffinland complied with all regulatory requirements associated with the Project as described in the NRB Project Certificate?		x		Yes	Yes	Done	Sustainability Specialist	"Summary of 2021 Compliance with Conditions" document & "Baffinland Iron Mines 2021 Annual Report to the Nunavut Impact Review Board" presentation, "Summary of 2021 Compliance with Conditions" section 4.3 (Page 58) (B-4)	Interviewed IBA Reporting Specialist - The Annual reports outline the status of compliance with terms and conditions of the PC. Since they are not all marked as compliant, evidence provided does not support the completion of the Audit Question - "The Status of PC Conditions in 2020" is an appendix attached to the 2020 annual report to the Nunavut Impact Review Board. The 2020 annual report to the Nunavut Impact Review Board was issued in May 2021. Therefore, the 2020 report is the most recent and relevant evidence as of December 31, 2021. Sustainability specialist/Manager, Community Resource Services (Sept 2022). Therefore, the 2021 NRB report is the most recent and relevant evidence as of June 30, 2022
		14.c. and all Nunavut Water Board Licenses related to the Project.	14.c. Has Baffinland complied with all regulatory requirements associated with the Project as described in all Nunavut Water Board Licenses related to the Project?	x			Yes	Yes	Done	Environmental and Regulatory Compliance Manager	Nunavut Water Board water Licenses allow for the use of Water and the deposit of Waste in support of the Project. Summaries of our use of water and deposits of waste are provided in the sections noted below (page numbers are for the pdf, not the document itself). The concordance tables also list all of the requirements for the Annual Report and where the info can be found within each report. C-12 Type A Water License JAM-MRY1325 - Pages 36-44 (Sections on Water Use, Waste Management, Reported Incidents, Monitoring) and 316-321 (Concordance Table) C-3 Type B Water License 28E-MRY2131 - Pages 4-14 (Parts B-I of License)	Interviewed IBA Reporting Specialist - Baffinland has complied with all regulatory requirements associated with the Project as described in all Nunavut Water Board Licenses related to the Project, as described in the license renewals. Steve Borczuk, Approvals Manager (Sept 2022). Type-B Water Licence has been renewed, new version has been provided in documented evidence
Total				44	4	9						