



Environmental Protection Operations Directorate  
Prairie & Northern Region  
5019 52<sup>nd</sup> Street, 4<sup>th</sup> Floor  
P.O. Box 2310  
Yellowknife, NT X1A 2P7

ECCC File: 6100 000 188/001  
NWB File: 18EN026

May 30, 2018

Via online registry

Cassel Kapolak  
Environmental Administrator  
Nunavut Impact Review Board  
P.O. Box 1360  
Cambridge Bay, NU X0B 0C0

Dear Mr. Kapolak

**RE: 18EN026 – Baffinland Iron Mines Corporation – Ege Bay Exploration Program – NIRB Screening**

Environment and Climate Change Canada (ECCC) has reviewed the information submitted to the Nunavut Impact Review Board (NIRB) regarding the above-mentioned screening. ECCC's specialist advice is provided based on our mandate, in the context of the *Canadian Environmental Protection Act*, the pollution prevention provisions of the *Fisheries Act*, the *Migratory Birds Convention Act*, and the *Species at Risk Act*.

The following comments are provided:

1. Migratory Birds

In section 1.1 of the Project Proposal, Baffinland Iron Mines Corporation (the Proponent) states that based on results from the initial drill program in 2019, the exploration program may be expanded. This expansion would include the sourcing of construction materials from one or two quarries, the construction of access trails and the constructions of a small airstrip. The construction of these features could involve the removal of vegetation.

The migratory bird nesting season in the project area is from the end of May until mid-August. It is important to note that breeding periods may vary year to year and that the above general nesting period is provided as guidance only. Paragraph 6(a) of the Migratory Bird Regulations, pursuant to the Migratory Birds Convention Act, states that no one shall disturb or destroy the nests or eggs of migratory birds. The inadvertent harming, killing, disturbance or destruction of migratory birds, nests and eggs is known as incidental take. The Proponent should carry out all phases of the project in a manner that protects migratory birds

and avoids harming, killing or disturbing migratory birds or destroying, disturbing or taking their nests or eggs.

ECCC recommends that the Proponent conduct all vegetation clearing activities outside of the migratory bird nesting season in order to avoid incidental take.

## 2. Waste Management Plan and Spill Contingency Plan

In section 1.2 of the Project proposal, the Proponent states that it will apply to the Nunavut Water Board (NWB) to address water use and waste disposal requirements. Furthermore, in section 2.5 of the Project proposal, the Proponent states that its Exploration Spill Contingency Plan is currently under preparation.

ECCC believes that the submission of an exploration program specific waste management plan and spill contingency plan is important and looks forward to reviewing these documents in the Proponents Type B Water Licence Application to the NWB.

ECCC recommends that the Proponent submit an exploration specific waste management and spill contingency plan in their Type B Water Licence Application to the NWB.

## 3. Quarries

In Section 2.6 of the Project proposal, the Proponent states that quarry rock will be assessed for acid rock drainage and metal leaching and that once this potential is assessed, quarry specific management plans will be developed. ECCC looks forward to reviewing these quarry specific management plans.

ECCC recommends that the Proponent submit quarry specific management plans that detail the acid rock drainage and metal leaching assessment once they are developed as part of the NWB's water licence process.

Should you require further information, please do not hesitate to contact me at (867) 669-4746 or [Gabriel.Bernard-Lacaille@canada.ca](mailto:Gabriel.Bernard-Lacaille@canada.ca).

Sincerely,

*[original signed by]*

Gabriel Bernard-Lacaille  
A/ Senior Environmental Assessment Coordinator

cc: Georgina Williston, Head, Environmental Assessment North (NT and NU)