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June 1, 2018

Solomon Amuno, PhD  
Technical Advisor II  
Nunavut Impact Review Board  
P.O. Box 1360  
Cambridge Bay, NU, X0B 0C0  
Via electronic mail to: [info@nirb.ca](mailto:info@nirb.ca)

**Re: Notice of Screening for Baffinland Iron Mines Corporation's "Ege Bay Exploration Program" project proposal**

Dear Mr. Amuno,

On May 9, 2018 the Nunavut Impact Review Board (NIRB) invited parties to comment on Baffinland Iron Mines Corporation's (Proponent) "Ege Bay Exploration Program" project proposal. Indigenous and Northern Affairs Canada (INAC) appreciates the opportunity to provide comments and offers the responses below as it pertains to the NIRB's request:

***Whether the project proposal is likely to cause significant adverse eco-systemic or socio-economic effects; and if so, why;***

While exploration projects, as defined by the scope of works included in this screening, could potentially cause adverse eco-systemic, INAC notes that there are insufficient details in the information provided in the application materials. Therefore, at this time INAC cannot fully assess the potential effects and mitigation measures of this project proposal.

**Impacts of Drilling:**

Environmental concerns with on-land geotechnical drilling relate to physical scarring and land disturbance, as well as potential water and groundwater contamination from drilling fluids, acid generation from exposed sulphide minerals, and release of metal-bearing groundwater. INAC recommends the Proponent provide information on how it intends to mitigate against potential impacts to the environment from the drilling in its proposed exploration program.



Management Plans:

In its project application “NIRB Application for Screening #125336” as well as in “Attachment B – Ege Project Proposal”, the Proponent makes references to mitigation measures outlined in numerous management plans that have been developed and approved for the Mary River Project. These plans are available through the NIRB’s public registry, but are not included as part of the project application materials for this screening. INAC recommends the Proponent submit iterations of the plans which are specific to the Ege Bay project proposal for review by the NIRB and other interested parties during the screening process. This recommendation refers to all plans listed in Section 7 – Environmental Management of the “Attachment 2 – Ege Bay Project Proposal”, including the three management plans that are currently under development:

- Spill Contingency Plan
- Closure and Reclamation Plan
- Monitoring and Inspection Plan

INAC also notes that the Management Plans should account for all activities and phases of the project, including expansion.

INAC appreciates the opportunity to provide comments and looks forward to working with the NIRB and the Proponent throughout any further review phases related to this project. Should you have any questions, please contact Julia Prokopick at (867) 975-4567 or by e-mail at [julia.prokopick@canada.ca](mailto:julia.prokopick@canada.ca).

Sincerely,

[Original Signed by]

Rachel Theoret-Gosselin  
A/Manager, Impact Assessment