

QIA Comment #	Document File Name	Section	Page	QIA Comment Subject	QIA Comment / Supporting Text
1	Project Application	Environmental Impacts	11	Absent Management Plan - Environmental Protection Plan	Baffinland makes reference to following a number of protection measures outlined in its "Environmental Protection Plan" yet does not provide the plan for review.
2	Non-tech summary	Summary	1	Absent Management plan - Closure and Reclamation Plan	Baffinland makes reference to following a closure and reclamation plan at the conclusion of exploration yet does not provide the plan for review. A project of this scale requires the deployment of a large quantity of infrastructure and supplies. Typically for projects like this, a proponent will provide details pertaining what should happen in the event that they can no longer operate the project.
3	Project Application	Identification of impacts and proposed mitigation measures	17	Absent Management Plan - Spill Contingency Plan	Baffinland states that any spills will be cleaned up in accordance to the "Spill Contingency Plan" yet does not provide sufficient information and does not provide the plan for review.
4	Project Application	Authorizations	6	Pending IOL application receipt	Baffinland has stated that they will require an IOL Land Use Licence in their project application. They have yet to apply to QIA. Review of an application like this will take time and QIA will need to bring the application to the Community Lands and Resource Committee for review. The sooner we receive the application from Baffinland the better. QIA has implemented changes with regards to its land application process. Just recently, the Qikiqtani Inuit Association has launched a new online Land Use Application Registry that will allow applicants to submit all land use permit applications to QIA online. With this system clients will not only be able to submit applications online but they will also be able to check the status of their project. All communication and documents associated with a project will be held in a single, easily-accessible location online. This online process is meant to replace the current paper based system. Please register with our system to provide all your project information, the online system can be accessed via the QIA website and also at http://qia.strata360.com/app/ .
5	Project Application	Description of Existing Environment: Socio-economic Environment	16	Socio Economic Benefits	Baffinland has described a current socio-economic status of the region but has stated that potential socio-economic effects will be limited and has failed to identify any way that this project would benefit the local economy. There is no indication that local businesses would be contracted nor is there a distinct commitment to train or hire local Inuit beginning from exploration start up.
6	Project Application	Non-technical project proposal description	1	Interaction with the Mary River Project	Baffinland states that workers and supplies will be delivered to the camp from Mary River. It is not clear how frequently flights will be going to and from Mary River to Ege Bay. The Proponent also makes reference to plans developed specifically for the Mary River Project without a description on how the plans may be altered specifically to suit Ege Bay. Because of the vicinity of the Mary River Project and its associated infrastructure, QIA has concerns that Baffinland may utilize Mary River for more than a base for workers and some supplies and that the travel corridor between the two may see more traffic than described.
7	Project Application	Identification of impacts and proposed mitigation measures	16	Exploration Area	Baffinland states that habitat loss will be relatively limited given the small footprint of the exploration program. Yet Baffinland states that it intends to conduct exploration activities throughout the leased area (approximately 867 square kilometers). Baffinland has not provided enough information about the total potential disturbed land or total exploration area. It is unclear how much area the proponent eventually desires to explore and thus it is impossible to determine the potential impact to the land.

8	Project Application	Project info	12	Scope of Project	Baffinland states that over 5 years, the 50 person camp may be expanded to a 100 person camp and subsequently they will implement other activities such as building bulk fuel storage, constructing access trails etc. It is unclear whether some project components are part of the initial start up or the expanded project based on exploration results. This makes reviewing the impact of the Project difficult.
9	Project Application	Identification of impacts and proposed mitigation measures	16	Noise impacts	Baffinland states that stationary and mobile equipment will generate noise and that the main sources of noise will include drills, helicopters and airplanes. Baffinland notes that wildlife may be impacted locally only, making specific mention of walrus. This section of mitigation measures fails to describe how Baffinland will reduce noise impacts on caribou migration and possible land users of the region who are known to have a historical link to the area. Finally, Baffinland states that they intend to construct an access road between the camp and exploration area which will reduce demand for helicopter use and will reduce noise in the exploration area. However, the noise generated through sourcing quarried material, building and using the road isn't accounted for in the application.
10	Project Application	Identification of impacts and proposed mitigation measures	18	Inuit Use of the Area	In this section of the application Baffinland states that this project area is not a high use area, based on a Mary River Inuit Knowledge Study and based on consultations with Igloolik and Hall Beach. Baffinland did not provide this study in their application.
11	Project Application	Closure and Reclamation	25	Permanence of site infrastructure	The Proponent describes camps as mobile, "Camps may be moved during or after the drilling season to minimise mobilisation and travel distances for more advanced exploration activities, primarily exploration drilling [sic]". QIA does not view the construction or relocation of a 100 person camp and supporting infrastructure as a small undertaking.

QIA Recommendation to Resolve Issue

QIA recommends that Baffinland provides the Environmental Protection Plan as part of the NIRB application process including references to measures specific to this project.

QIA recommends that Baffinland provides the Closure and Reclamation Plan as part of the NIRB application process including references to measures specific to this project. In addition, Baffinland should describe what quantity and type of security they will be posting.

QIA recommends that Baffinland provides the Spill Contingency Plan as part of the NIRB application process including references to measures specific to this project.

QIA Recommends that Baffinland applies for a IOL Land Use Licence via <http://qia.strata360.com/app/> as soon as possible so that QIA can initiate the review.

QIA recommends that Baffinland provide details as to how they will maximize local opportunities for training, employment, and business involvement.

QIA requests that Baffinland describes the use, extent and interation of the Mary River project with the Ege Bay exploration program, as well as identifying the potential impacts of connecting the two projects in this way.

QIA requests that Baffinland provide much more detail regarding their proposed activities which includes the area they will explore. This will help detail habitat loss and disturbance.

QIA requests that Baffinland provide more information in a detailed workplan that defines how the project will evolve over time on a year by year and seasonal basis. QIA also requests that Baffinland be explicit in detailing the maximum level of activities it is currently applying for.

QIA recommends that Baffinland provides a detailed environmental protection plan for review that describes in greater detail how they will minimize noise impacts on wildlife and land users.

QIA Recommends that Baffinland provides more detailed information available to them regarding contemporary Inuit land use .

QIA requests that the Proponent clarify whether it intends to build a single camp or multiple camps in the Project Development Area (currently undefined), and whether moving the camp and related infrastructure to a different location is part of this application.