

Table 1 - Baffinland Responses to Reviewer Comments on NIRB Screening of the Ege Bay Exploration Program

Comment No.	Reviewer Comment	Baffinland Response
Qikiqtani Inuit Association		
QIA-01	<p>Baffinland makes reference to following a number of protection measures outlined in its "Environmental Protection Plan" yet does not provide the plan for review.</p> <p>QIA recommends that Baffinland provides the Environmental Protection Plan as part of the NIRB application process including references to measures specific to this project.</p>	<p>Baffinland believes reviewers are familiar with its Environmental Protection Plan (EPP) for the Mary River Project, available on Baffinland's Document Portal. The EPP and other relevant management plans will be reviewed during the water licencing stage and in concert with feedback from the relevant regulatory agencies and the land owner.</p> <p>Additionally, Baffinland asserts that reviewers do not need to review the specifics in management plans to establish whether or not the Ege Bay Exploration Program is likely to cause significant adverse effects. Having said this, Baffinland has provided a Draft version of the Ege Bay EPP with these responses, to be further updated during the water licencing process.</p>
QIA-02	<p>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.</p> <p>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.</p>	<p>Closure and Reclamation Plans as well as the reclamation security estimate is normally provided for review and approval during the water licencing process. Baffinland intends to work closely with the QIA to establish a Closure and Reclamation Plan that meets the QIA's Abandonment and Reclamation Policy for Inuit Owned Lands. Baffinland will submit the Draft Closure and Reclamation Plan for QIA review in concert with the Land Use Application. Reclamation security will be filed with the subsequent application for a Type B Water Licence.</p>
QIA-03	<p>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.</p> <p>QIA recommends that Baffinland provides the Spill Contingency Plan as part of the NIRB application process including references to measures specific to this project.</p>	<p>As with Closure and Reclamation Plans, Spill Contingency Plans are required plans that are approved under a water licence. As there is a subsequent regulatory process that involves reviewing and determining the adequacy of such a plan, we suggest that such a plan is not required to determine if a project has the potential to cause significant adverse effects. Nonetheless, Baffinland has included its Draft Spill Contingency Plan, to be further updated during the water licencing process.</p>
QIA-04	<p>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/.</p> <p>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.</p>	<p>We understand the QIA's comments, and thank you for information regarding QIA's new on-line application process. A hard copy of the Land Use Application was prepared and will be transcribed into the online registration system for submission.</p>
QIA-05	<p>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 anyway 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;</p> <p>QIA recommends that Baffinland provide details as to how they will maximize local opportunities for training, employment, and business involvement.</p>	<p>Section 6.11 of the Project Proposal states: "Baffinland will look for opportunities to engage the communities of Hall Beach and Igloolik in employment, contracting and procurement activities, to help maximize potential socio-economic effects." We believe this is indication of Baffinland's commitment to hire local Inuit. Baffinland plans to preferentially hire from the two closest communities (Hall Beach and Igloolik), and will look for opportunities to contract Inuit companies such as was done during the exploration phase of the Mary River Project. Baffinland is still working out further details. Baffinland currently follows procedures to maximize procurement from Inuit companies on the Mary River Project.</p>

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QIA-06	<p>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.</p> <p>QIA requests that Baffinland describes the use, extent and interaction 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.</p>	<p>Baffinland has been conducting regional exploration at Ege Bay since 2013 in accordance with its current approvals which allow for such regional exploration. However, the distance between Ege Bay and Mary River is significant, and therefore it is costly and inefficient to operate the Ege Bay Exploration Program from Mary River. As such, Baffinland expects to staff the Ege Bay Exploration Program as an operation separate from the Mary River Project, at least once the exploration camp has been established. Most of the supplies required by Ege Bay will be delivered by sealift to Ege Bay. Mary River will be used as a base during construction of the initial exploration camp. To minimize impacts of flights between Mary River and Ege Bay, Baffinland will adhere to minimum flight altitudes, weather permitting. As soon as reasonably possible, Baffinland plans to establish its Ege Bay exploration workforce, drawing Inuit labour from Hall Beach, Igloodik and possibly Iqaluit.</p>
QIA-07	<p>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.</p> <p>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.</p>	<p>In its Ege Bay Project Proposal, Baffinland has described an exploration program that may grow over the course of a 5-year period, so as to not scope the exploration too narrowly only to incrementally grow the program over time. Exploration drilling will be undertaken at one specific area, the Initial Exploration Area shown in the Project Proposal. Baffinland plans to seek an IOL Land Use Licence to complete the exploration drilling program within the defined footprint of the Initial Exploration Area as described in the Project Proposal. The Potential Development Areas identified in the Project Proposal are as follows:</p> <ul style="list-style-type: none"> - Initial Exploration Area - 11.39 km² (only a small portion of this area will be disturbed by drilling) - Camp/Airstrip/Quarries Area - 1.35 km² - considered to be a higher impact area; greater disturbance) - Connecting access road - 0.59 km² <p>Grassroots exploration (i.e., geological mapping; geophysical surveys; surface sampling) will also likely continue across the larger land parcel. Baffinland is not seeking to conduct drilling or construct access roads over the entire extent of the parcel. Additional specific targets may be identified for drilling in the future from grassroots exploration. If Baffinland identified additional targets for drilling that are outside of the currently defined exploration footprint, it will talk to the landowner to seek permission through another or amended IOL land use licence.</p>
QIA-08	<p>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.</p> <p>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.</p>	<p>Baffinland clearly delineated its initial exploration program (the minimum level of activity proposed) in the 5th paragraph of Page 1 of the Project Proposal. Baffinland further described a scenario of maximum exploration activity (to the extent that this is possible; no exploration drilling has been completed to date) within a 5-year timeframe in the 6th paragraph of Page 1. The remainder of the Project Proposal provides additional detail on this, and assesses the impacts of the maximum exploration activity scenario (i.e., 100-person camp, quarrying, access road and airstrip construction). How the exploration program unfolds is dependent upon the exploration results. It is possible that the initial drilling is disappointing and Baffinland abandons the exploration program after one or two years. If initial drilling results are promising, Baffinland could seek to expand to the 100-person camp and nine drills in year 2 or 3. Cognizant of the resources required to review amended applications, Baffinland has provided an analysis of the maximum anticipated extent of the program, within the first 5 years, to allow for a more comprehensive review at the initial stages of the program.</p>

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QIA-09	<p>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.</p> <p>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.</p>	<p>There will be noise impacts within the immediate exploration area from overflights, construction activities and operation of mobile equipment. Baffinland will attempt to minimize noise impacts on wildlife and other land users from aircraft by adhering to minimum flight altitudes, where possible. Given the short distance between the exploration camp and exploration area, however, it will not always be possible to adhere to the minimum flight altitude, as is the case with most exploration projects. Constructing an access road or trail has noise and ground disturbance impacts, but ground-based noise sources are considered less intrusive than aircraft. Although construction of road access will help to minimize noise emissions, there are other advantages such as reducing the volumes of fuel required and improve the efficiency of the exploration drilling operation. Specific mitigation measures to reduce noise from mobile equipment has been provided in the EPP.</p> <p>With respect to the EPP, the management plans referenced in the Project Proposal for screening will be provided with the application for a Type B Water Licence. Management plans will be similar to those prepared for the Mary River Project, available on the Document Portal.</p>
QIA-10	<p>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 Igloodik and Hall Beach. Baffinland did not provide this study in their application.</p> <p>QIA Recommends that Baffinland provides more detailed information available to them regarding contemporary Inuit land use .</p>	<p>The QIA has the same products of the Mary River Inuit Knowledge Study available to them for review. The Mary River Inuit Knowledge Study shows that the Ege BAY area has been used by elders within their lifetime, but the area lies near the outer zone of land use by the five North Baffin communities that participated in the study. Contemporary land use is concentrated closest to each of the communities. This is perhaps best illustrated by the harvest location data of the Nunavut Wildlife Harvest Study (Priest and Usher, 2004). This harvest location information is shown on Figure 3.31 (caribou harvests), Figure 3.33 (marine mammal harvests), Figure 3.35 (waterfowl and egg harvests) and Figure 3.37 (fish harvests) of the land use report presented as Appendix 4C of the Final Environmental Impact Statement for the Mary River Project. These figures have been extracted from that report and are appended to this response. The harvest study data is thought to be the most comprehensive spatial database of harvesting, which largely represents land use in the North Baffin.</p> <p>During consultation on Ege Bay, the following comments were received which acknowledge the Ege Bay area is an area important historically; meeting participants did not indicate that the area is used contemporaneously:</p> <p>"Archaeological sites are important. So are trails for migration routes, and burial sites. There are many sites in that area. Will archaeological work be done before things get started?"</p> <p>"The minerals at Ege Bay, our ancestors knew that there were minerals there. There is also burnable minerals there, like coal. This belongs to our ancestors."</p> <p>"This is very sensitive for us, especially for the Elder on my left – it is his traditional hunting area. This subject is very sensitive for me as well, remembering my father (name provided); they were translators and guides for the explorers in those days in that area. In [Inuktitut term] camp, according to his dad's stories, there were minerals found there. They made a stake. Our grandparents found those, initially. Those have been taken away from us again. According to the government, if historical areas >50 years according to the act. Therefore, that area, I'm wondering what will you do? what are your plans? Will you be acknowledging the historical areas? I have many questions, but since I am here representing the QIA, I am asking as an individual Igloodik resident."</p> <p>"I myself have heard that they are thinking of doing exploration at Ege Bay. We weren't going to talk about Mary River, but when that got started, I was involved in the committee and I heard about Ege Bay at that time. Our grandmother's grave – would they include the water as they said they would in the past? My other question, when they were drilling in 1960-61, the places they drilled before, do you have the locations of where they were drilling? This is not the first I've</p>
QIA-11	<p>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 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.</p>	<p>Baffinland acknowledges that the reference sentence is misleading. What was intended was to convey that exploration programs are temporary in nature, and that exploration camps can without significant effort be brought to another exploration area (i.e., to another exploration program away from Ege Bay). Baffinland does not plan to relocate its 50-person or 100-person exploration camp to other locations within the Exploration Agreement Area.</p>

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INAC-01	<p>Whether the project proposal is likely to cause significant adverse eco-systemic or socio-economic effects; and if so, why?</p> <p>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.</p>	<p>Baffinland respectfully disagrees and believes the information required by the NIRB to screen such an activity to determine whether or not the activities may potentially cause significant adverse effects and consequently if additional review is required, has been provided. NIRB and the review agencies including INAC regularly screen such exploration programs based on this level of detail. If INAC can indicate the information that is lacking to make its assessment, Baffinland will look to provide this information.</p>
INAC-02	<p>Impacts of Drilling:</p> <p>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.</p>	<p>Drilling is an acceptable activity under the Territorial Lands Act and regulations, and Baffinland is not proposing anything unique from other exploration drilling programs. Baffinland and its drilling contractor have significant experience drilling and understand how to comply with applicable legislation and industry best practices. Drill water will be managed using sumps, and drilling will be set back from watercourses a minimum of 31 m. Baffinland's EPP contains operational environmental standards (mitigation measures) applicable to drilling, ground disturbance, watercourse crossings, etc. The Draft Ege Bay EPP, adapted from Baffinland's Mary River EPP, has been provided with these responses.</p>
INAC-03	<p>Management Plans:</p> <p>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:</p> <ul style="list-style-type: none"> • Spill Contingency Plan • Closure and Reclamation Plan • Monitoring and Inspection Plan <p>INAC also notes that the Management Plans should account for all activities and phases of the project, including expansion.</p>	<p>The following management plans specific to Ege Bay are provided with this response:</p> <ul style="list-style-type: none"> - Draft Ege Bay Spill Contingency Plan - Draft Ege Bay Environmental Protection Plan - Draft Monitoring and Inspection Plan <p>A number of other Mary River Environmental Management Plans were referenced in Section 7 of the Project Proposal. The salient contents of the following plans have been incorporated in the Ege Bay EPP:</p> <ul style="list-style-type: none"> - Surface Water and Aquatic Ecosystems Management Plan - Terrestrial Environment Mitigation and Monitoring Plan - Cultural Resources Protection Plan - Waste Management Plan <p>Additional plans to be developed in the future include:</p> <ul style="list-style-type: none"> - A future quarry-specific management plan to be developed when Baffinland seeks a Quarry Concession Agreement with the QIA. A key mitigation measure of testing the rock for acid rock drainage / metal leaching (ARD/ML) potential prior to developing either quarry was stated in the Project Proposal. - Sampling Program Quality Assurance and Quality Control Plan - This will be a requirement of the Type B Water Licence. The Mary River Project plan will be used to develop an Ege bay version of the plan during the water licensing process.
Fisheries and Oceans Canada		
DFO-01	<p>Whether the project proposal is likely to arouse significant public concern; and if so, why;</p> <p>DFO-FPP is not aware of any significant public concern at this stage of review.</p>	<p>No response required.</p>
DFO-02	<p>Whether the project proposal is likely to cause significant adverse eco-systemic or socio-economic effects; and if so, why;</p> <p>DFO-FPP requires additional information to assess the Proponent's application pursuant to its mandate to maintain the</p>	<p>Additional information will be included in an application for an authorization, as required. The level of information provided is consistent with other exploration projects. Only two culvert crossings and a barge landing have been identified.</p>
DFO-03	<p>Whether the project proposal is likely to cause significant adverse impacts on wildlife habitat or Inuit harvest activities; if so, why;</p> <p>PDFO-FPP has reviewed the Proponent's application pursuant to its mandate to determine whether it is likely to result in serious harm to fish which is prohibited under subsection 35(1) of the Fisheries Act unless authorized. The proposal states that culverts will need to be installed to build roads for the camp. Technical drawings and a hydrological report are required to evaluate the impacts of these culverts with regards to fish habitat and fish passage. Information regarding the volume of lakes EB-1 and EB-2 is required to assess impacts to fish and fish habitat for camp and drilling</p>	<p>The culvert design report referenced in the Project Proposal is attached.</p>

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DFO-04	Whether the project proposal is of a type where the potential adverse effects are highly predictable and mitigable with known technology, (please provide any recommended mitigation measures); and The Proponent has indicated that the intake structure will be screened. Please refer to the Department of Fisheries and Ocean's 'Freshwater Intake End-of-Pipe Fish Screen Guideline' for further mitigation measures for intake structures. Measures to avoid causing harm to fish and fish habitat can be found on our website and should be incorporated into project design for culvert installations (http://www.dfo-mpo.gc.ca/pnw-ppe/measures-mesures/measures-mesures-eng.html).	No response required.
DFO-05	Any matter of importance to the Party related to the project proposal. In order for us to complete the review of the culvert installations and water taking activity, we ask that you complete a request for review form (www.dfo-mpo.gc.ca/pnw-ppe/reviews-revues/index-eng.html) and submit with associated documents to FisheriesProtection@dfo-mpo.gc.ca.	Thank you for the information. Baffinland will submit a Request for Review to DFO in advance of carrying out any in-water activities.
Government of Nunavut		
GN-01	The GN is concerned with a general lack of information about Project activities. There are numerous instances of conflicting or missing information that is required to assess the level of activity proposed in the application, and understand the potential impacts to wildlife and the environment of that activity. Examples include the following: - There is uncertainty regarding the spatial extent of the Project. Figure 2 in "Ege Bay Exploration Program Project Proposal, April 2018" shows a large area encompassing all lease access lands, which total over 860km ² , but shapefiles and descriptions in the proposal suggest that exploration is limited to a portion of IOL Parcel IG-03 that is approximately 11.5km ² .	Baffinland suggests the following sentence, found on page 9 of its Project Proposal, provided a misleading description of Baffinland's plans for exploration within the Initial Exploration Area and the IG-03 Exploration Agreement Area: <i>The expanded drilling program may extend the length of a mineralized zone across the entire IG-03 Exploration Agreement Area as well as the mining claims on Crown Land that extend north of the IG-03 Exploration Area (Figure 2).</i> Baffinland does not plan to conduct its drilling program along the length of the exploration agreement area and adjacent Crown mineral claims, as we acknowledge this sentence seems to imply. The only area where exploration drilling is currently planned is within the Initial Exploration Area. Baffinland plans to seek an IOL Land Use Licence to conduct exploration drilling within the Initial Exploration Area only, and to construct and operate the other features described in the Project Proposal (i.e., camp, access road, etc.) The remainder of the area (i.e., IG-03 Exploration Agreement Area and adjacent Crown mining claims) will be subject to regional exploration efforts without exploration drilling (i.e., geophysical surveys, till sampling, possibly backpack drilling). It is conceivable that ongoing regional exploration efforts within this larger area may identify other specific targets for exploration drilling. Baffinland would seek additional permission from the landowner if exploration drilling was proposed outside of the Initial Exploration Area.
GN-01	- There is uncertainty regarding the temporal extent and level of Project activity. The Proponent states, "The camp will be capable of being operated year-round." Later in the Project proposal document, pg. 7, "Baffinland expects to maintain a small care and maintenance staff year-round during most years...". In section 3.2, the Proponent states, "Ultimately the exploration program could grow to up to nine (9) diamond core drills operating year-round." These conflicting statements cause ambiguity with regard to the temporal extent of the proposed Project.	The temporal extent of the proposed project was described in the NIRB on-line application form to be a 5-year period from 2018 to 2023. The Project Proposal describes camp mobilization and setup in the late summer and fall of 2018, an initial drilling program (50-person camp; two drills) starting in 2019, and the possibility that within a 5-year period the exploration program could ramp up to a 100-person camp and 9 drills, and construction of an access road and airstrip. The statements referenced by the GN do not conflict each other. The camp will be capable of operating year round, and ultimately the exploration program could be undertaken year-round. During most years, Baffinland expects that a small care and maintenance crew to be present at the camp even if exploration drilling is not underway. It is conceivable, however, that the camp be shut down during the coldest months of the year, if this can be done safely and securely.
GN-01	- There is uncertainty regarding the length and use of the access road. The Proponent states that this road will be 4km long, but shapefiles provided in the application show it to be over 8km. Additionally, the Proponent has not provided information on potential traffic volume or addressed possible impacts regarding fuel consumption, noise generation of blasting, quarrying, crushing, transporting quarried materials, and overall construction and use of the road.	We acknowledge that the Project Proposal incorrectly references the length of the access road to be 4 km. The total length of road including within the camp area and to the quarries is approximately 13 km. Referring to the access road as an access trail may better reflect the level of construction and use that the road will receive. Construction of the road will be very basic: placement of a subgrade and surfacing material on the tundra, and the installation of culverts at watercourse crossings and also where drainage across the road is required. The road width will be 5 to 10 m. Once constructed, the volume of traffic on the access road will be very low, limited to several pick-up trucks moving workers, drilling supplies and fuel between the drill sites and the exploration camp.

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GN-01	<p>- Baseline environmental studies have not been developed for the Project, nor are they planned. Aside from archaeological surveys and basic quantification of Project water supplies, the Proponent states that “baseline studies are not planned at this time.” A lack of baseline environmental information hinders the ability to monitor Project effects.</p>	<p>Environmental baseline studies are rarely initiated for an exploration project until such time as there is an indication that the mineral deposit is potentially economic. Ege Bay has been subject to regional exploration efforts, but the present proposed exploration drilling program must be conducted to generate such information. Baseline studies appropriate to the exploration program are being proposed, as referenced by the GN.</p>
GN-01	<p>- There is uncertainty related to the size of the Project footprint, Potential Development Area (PDA), impacted vegetation areas, and habitat disturbance/loss. The Proponent states that the removal of vegetation is “negligible” but also indicates that vegetation surveys have not been completed in the exploration area; The GN suggests that the Proponent review the application for inconsistencies and missing information. Due to the spatial and temporal extent of the project proposal, the GN recommends that the Proponent conduct wildlife and vegetation baseline studies on species abundance and distribution, as well as monitoring levels of disturbance from Project activity. See comment # GN-04 for specific recommendations related to caribou.</p>	<p>The Potential Development Areas used in the application for an Inuit Land Use Licence were as follows: - Initial Exploration Area - 11.39 km² (only a small portion of this area will be disturbed by drilling) - Camp/Airstrip/Quarries Area - 1.35 km² - considered to be a higher impact area; greater disturbance) - Connecting access road - 0.59 km² In the context of the North Baffin Region, the amount of ground disturbance resulting in vegetation removal is negligible. Baffinland is willing to discuss this further with the GN.</p>
GN-02	<p>The GN is concerned that the Proponent has cited multiple environmental management plans developed for the Mary River Project without specifying which elements of these plans are applicable to the Ege Bay Project. The GN is also concerned that there are no steps or indications of how the Mary River management plans will be implemented within the context of the Ege Bay Project. The GN recommends that the Proponent separate the portions of its Mary River management plans that are applicable to Ege Bay into a single or multiple documents that can be assessed within the context of the Ege Bay proposal. The GN recommends that the Proponent provide the completed management plans within this application, and that Project screening not be considered complete until these plans have been reviewed by stakeholders.</p>	<p>The following management plans specific to Ege Bay are provided with this response: - Draft Ege Bay Spill Contingency Plan - Draft Ege Bay Environmental Protection Plan - Draft Monitoring and Inspection Plan A number of other Mary River Environmental Management Plans were referenced in Section 7 of the Project Proposal. The salient contents of the following plans have been incorporated in the Ege Bay EPP: - Surface Water and Aquatic Ecosystems Management Plan - Terrestrial Environment Mitigation and Monitoring Plan - Cultural Resources Protection Plan - Waste Management Plan</p>
GN-03	<p>The GN is concerned that several management plans are still under development at the time of this review. The Proponent lists three plans as unfinished: - Spill Contingency and Prevention Plans - Closure and Reclamation Plan - Monitoring and Inspection Plan Without this information provided within the application, it cannot be reviewed or assessed at this time. The lack of assessment of these sections leaves information gaps in the GN’s assessment of this Project Proposal. The GN recommends that the Proponent provide the completed management plans within this application, and that Project screening not be considered complete until these plans have been reviewed by stakeholders.</p>	<p>Additional plans to be developed in the future include: - A future quarry-specific management plan to be developed when Baffinland seeks a Quarry Concession Agreement with the QIA. A key mitigation measure of testing the rock for acid rock drainage / metal leaching (ARD/ML) potential prior to developing either quarry was stated in the Project Proposal. - Sampling Program Quality Assurance and Quality Control Plan - This will be a requirement of the Type B Water Licence. The Mary River Project plan will be used to develop an Ege Bay version of the plan during the water licensing process.</p>

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GN-04	<p>The Proponent describes caribou in the Project area as follows, "Caribou are expected to remain at low numbers for the next couple of decades. However, there is evidence that caribou do occur throughout the entire region. While some populations of caribou migrate between preferred habitats in summer and winter, North Baffin caribou appear to be non-migratory and are likely to be found relatively equally in many locations throughout the Project area."</p> <p>Work done by the GN in the area, as well as IQ collected in a report conducted for BIMC, indicates that North Baffin caribou do exhibit dynamic migratory pathways and have preferred seasonal habitats. In addition, low caribou populations have resulted in congregations of small groups in key habitat and areas containing the best forage, which means these populations do not exhibit uniform distribution across the Project area.</p> <p>While little is known about these populations, the Proponent has provided an inaccurate description of caribou behaviour and population distribution in the Project area.</p> <p>Aside from noting general impacts, such as noise disturbance, the Proponent has not provided sufficient information to characterize the spatial or temporal extent of its activities or the possible impacts of Project activity on caribou populations in the vicinity of the Project area. The GN recommends that the Proponent complete caribou baseline monitoring studies, a review of appropriate literature, and consult with local IQ holders and subject matter experts on this issue. Once these baseline studies are concluded conclusions on impacts to caribou can be derived. In addition to providing more detail on expected impacts to caribou, the GN recommends that the Proponent begin collecting baseline disturbance data to assess the impacts to caribou from the Project. This will be important if the Project undergoes expansion in the future.</p> <p>The GN recognizes that caribou populations are low, and that the most effective means to monitor Project impacts to caribou is through a regional caribou population monitoring effort. Such a program could take the form of contributions to an existing GN effort. The GN is willing to advise or collaborate with the Proponent on this issue.</p> <p>The Proponent should review the IQ and caribou work it completed for Phase 1 of the Mary River Project, as well as working directly with IQ holders in Igloodik and Hall Beach to better understand caribou habitat use and occupancy patterns in the Ege Bay Project area.</p>	<p>Due to the low densities of caribou in the PDA and the region, Baffinland has already been investing in regional caribou monitoring conducted by the GN. Baffinland has invested funds and in-kind resources in these regional monitoring programs since 2009, and has committed to providing continuing support. For example, in 2017, Baffinland provided support for the North Baffin Island fall caribou population surveys by providing helicopter access, fuel and accommodations for the survey team at the Mary River mine site.</p>
GN-05	<p>In describing sensitive wildlife locations, the Proponent states, "Air traffic will avoid this area and will be mindful of the possible presence of other walrus haul-outs as well as caribou in the area. Other key mitigation measures to minimize noise emissions include adherence to minimum flight altitudes specified in land use licenses."</p> <p>The GN is concerned that there is significant potential for disturbance impacts to sensitive wildlife species from air traffic. The GN recommends developing and sharing approach and departure vectors for fixed and rotary wing aircraft that respect minimum flight altitudes and provides adequate offset distances from sensitive wildlife resources that are known and discovered through the course of the Project. This would include flights in and out of camp, as well as point-to-point personnel shuttling and drill repositioning throughout the Project area on an as-needed basis.</p> <p>The GN also recommends implementing the flight log and pilot awareness protocols utilized in the Mary River Project, to improve compliance and support tracking of impacts.</p>	<p>Baffinland's EPP specifies minimum flight altitudes and the avoidance of walrus haul-outs. The collection of flight logs is standard practice and will also be carried out, along with pilot awareness training of minimum flight altitudes and avoidance of local wildlife sensitivities.</p>

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GN-06	<p>The Proponent does not address polar bears within its proposal application. Polar bears are a key species within the Arctic, as well as a Valued Ecosystem Component (VEC), and listed as a species of Special Concern by the Committee on the Status of Endangered Wildlife in Canada (COSEWIC). The ecological impact of seasonal shipping and exploration activities related to this Project has not been evaluated for polar bears and no ecological monitoring or mitigation measures have been proposed in the current application. As such, further assessment is necessary. The GN is concerned that bears are not discussed within wildlife impacts, waste management, or bear safety and response plans. The GN recommends that the Proponent describe how its activities occur within bear habitat and how bears may be impacted by the proposed activities, including denning, sows and young cubs, etc. The Proponent should describe specific measures within its waste management plan related to bears.</p> <p>The Proponent should describe any and all measures taken to train, prepare for, and protect site-based workers during bear encounters, for both their safety and that of the bears.</p> <p>The GN has a variety of resources available to support training and bear awareness, and is willing to advise or collaborate with the Proponent in doing so.</p> <p>Additional Comments: Working in a remote area in proximity to the coast places Project site staff in polar bear habitat, specifically within the Foxe Basin sub-population. Site staff should expect bear encounters and be trained and prepared to deal with them.</p> <p>Not only can bears be impacted by project activities (e.g. aircraft over flights, additional energy expenditure through avoidance of ground-based activity), but poorly managed waste can serve as an attractant to bears, leading to injury or death to the bears, damage to equipment, and possible injury or death to Project staff on-site.</p>	<p>The GN's comments regarding the polar bear as a relevant VEC and a species of Special Concern are noted. According to the Mary River Project FEIS (Volume 8, Section 5.1) the Ege Bay Exploration Area is located within an area identified by IQ for polar bear denning.</p> <p>Baffinland will be implementing best practices with respect to waste management, as described in the EPP.</p> <p>Baffinland will be implementing the same polar bear mitigation measures at Ege Bay as currently implemented at the Mary River Project. As with Baffinland's previous camp at Steensby Port, an electric fence will be installed around the perimeter of the camp. All site staff will receive polar bear safety training as part of site orientation/induction training. Bear monitors will accompany staff in the field who are not accompanied by a vehicle or helicopter.</p>
GN-07	<p>In describing water use for exploration work, the Proponent states, "For the exploration work, 270 m³ of water will be pumped daily from Unnamed Lake #1. The estimated water volume is to operate nine (9) exploration drills. ... Opportunities to recycle drill water will be investigated and utilized as the scale of the drilling program increases over time." The GN is concerned that there is a potential for adverse environmental impacts from disposal of drilling fluids and muds, including effects on vegetation and wildlife. The GN recommends describing drilling waste management for the exploration program and assessing the potential environmental impacts as appropriate.</p>	<p>Baffinland can provide the following additional information with respect to minimizing impacts from drilling. All efforts will be made to minimize the footprint of disturbance from drilling. Runoff from the drill, if not recycled, will report to sumps. Drilling will not be undertaken within 31 m of a waterbody. As such, runoff from drilling will not reach local waterbodies. Environmentally-friendly drilling muds are used, and drillholes will be backfilled with cuttings once drilling has been completed (or during the following summer). Effects to vegetation and wildlife are not expected beyond the disturbance of vegetation over a small area at the drill site.</p>
GN-08	<p>The application notes that an initial 50 person camp will be established in fall 2018 to support the exploration program. The camp will be providing food, water, and waste systems to service the camp. The services will require review under the Public Health Act.</p> <p>Additionally, in the Ege Bay Exploration Program Project Proposal (April 2018) document, Section 2.3, Sewage and Grey Water Disposal that "There is the option that greywater will be directed to an excavated sump rather than to the sewage treatment plant. This option will be considered as a means of improving the quality of the sewage influent into the sewage treatment plant, to optimize treatment performance. The sump will be located more than 31 m from the high water mark of Ege Bay."</p> <p>Should grey water be directed to an excavated sump or any other wetland discharge without treatment a feasibility study should be completed to ensure the effluent will meet acceptable discharge criteria as per the Government of Nunavut. There is further concern with wetland discharge that communicable disease may be transmitted to humans and/or wildlife; The Government of Nunavut recommends the Proponent contact the Department of Health Environmental Health Officer, located at Iqaluit Public Health, Box 1000 Iqaluit, (867 645 8071) to provide information regarding the food and water services and facilities that will be provided to the Project workers.</p> <p>Further, the Government of Nunavut recommends that all sewage effluent be directed to the package sewage treatment plant prior to discharge. Should grey water be diverted to an excavated sump, or any other method of discharge that does not undergo treatment, a feasibility study be completed to ensure that the effluent will meet suitable discharge standards and transmission of communicable disease will not occur to humans or wildlife.</p>	<p>Greywater sumps widely used at exploration camps and are approved by the waters inspector.</p>

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GN-09	<p>The Proponent is proposing a mineral exploration program in the Qikitqani region approximately 90km southeast of Steensby Port (Ikpikitturjuaq), and 190 km northeast of the community of Hall Beach. The proposal puts forward the establishment of: a fifty (50) person camp which will subsequently expand to 100 persons and associated infrastructure (greywater and sewage treatment facility, incinerator); the use of a sealift barge landing area and storage areas; the construction of an airstrip and access trails connecting the camp site to the exploration area; the use of water from surrounding lakes/pond; geological mapping, till sampling and a drilling program.</p> <p>A search of the Nunavut Archaeological Site indicates that nine (9) sites are recorded in the proposed exploration area. This however does not preclude the presence of unidentified sites or cultural features as to this day no systematic archaeological reconnaissance has been conducted in this area; The Department of Culture and Heritage has no concerns with this proposed project as the Proponent's archaeologist has already filed a Class 2 permit application to conduct the archaeological assessment of the different components associated with the proposed exploration activities in Ege Bay.</p> <p>All archaeological and palaeontological sites in Nunavut are protected by law. The applicant must understand that it is their responsibility to ensure that no heritage resource sites are disturbed in the course of their activities. No person shall alter, or otherwise disturb an archaeological site, or remove any artifact from an archaeological site. Moreover, the</p>	Noted, thank you for the comment.