Baffinland Iron Mines Corporation

Eqe Bay Environmental Protection Plan

BAF-PH1-XXX-XXX-XXX

DRAFT

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0 CONTENTS AND REVISION CONTROL

The Environmental Protection Plan (EPP) is a living document and is subject to on-going updates. The Contents and Revision Control Operational Standard presented, herein, outlines the contents of the EPP and provides a Contents List with the most recent revision date for each Operational Environment Standard (OES). The Contents List will be updated and re-issued when any OES is revised or added.

This EPP has been prepared specific to the Eqe Bay Exploration Program, based upon the same document for the Mary River Project (BAF-PH1-830-P16-0008, Rev 1, August 30, 2016). All OESs will be considered Rev. 0 in this initial Eqe Bay EPP; the previous revision control record has not been carried over into this new plan.

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1 INTRODUCTION

The purpose of the Environment Protection Plan is to ensure that a high level of importance is placed on the protection of the environment by Project Personnel throughout the lifecycle of Baffinland Iron Mines Corporation's (Baffinland's) Eqe Bay Exploration Project (Project). This document provides Operational Environmental Standards (OESs) to identify and address Project environmental issues and concerns and to provide guidance and control measures (which may be field fit as required), to avoid potential negative impacts to the environment and/or minimize or mitigated these impacts to the greatest extent practicable. The OESs are not comprehensive and are intended to be used in conjunction with relevant documents such as Environmental Management Plans (EMPs), Standard Operating Procedures, Environmental Permits, Licences, and Regulation, etc. The EPP will be updated as required to reflect current management reviews, incident investigations, regulatory changes, or other Project-related process modifications. The EPP is an integral part of the Project's Environmental Management System implemented for the Project to allow for the integration of environmental issues and regulations into the design/engineering and operation of the Project through the implementation and evolution of the OESs presented in this document.

The EPP provides a practical way to facilitate field implementation of environmental regulations, practices, and measures required to eliminate or reduce potential adverse environmental effects. It is a working document for use by Project Personnel, as well as at the Baffinland corporate level for ensuring commitments made in policy statements are implemented and monitored. The EPP provides a quick reference for Project Personnel to monitor for compliance and to make suggestions for improvements. This EPP provides the general protection measures for routine and unplanned activities associated with the Project. The EPP is developed in recognition of applicable permits, authorizations, approvals and Inuit Knowledge. As well, the plan provides operational measures that comply with aforementioned permits, approvals, etc., and provides reference to other associated and relevant documents such as Environmental Management Plans and Standard Operating Procedures.

The specific purposes of the EPP are as follows:

- Provide a reference document to ensure that commitments to minimize adverse environmental effects will be met.
- Document and identify environmental concerns and ensure appropriate protection measures are implemented.
- Provide concise guidance to Project Personnel regarding the implementation of appropriate standards for protecting the environment and minimizing adverse environmental effects.
- Provide a reference and training document for Project Personnel when planning and/or conducting specific activities and working in specific areas.

- Communicate changes in the program through the revision process.
- Provide a reference to related applicable documents such as legislative requirements, guidelines, permits, Environmental Management Plans, Standard Operating Procedures, etc.

The EPP provides documentation of environmental protection measures against which the environmental performance of Project Personnel can be readily measured and corrective actions developed and implemented where required. Project Personnel are expected to understand and implement the environmental protection measures provided within the EPP. If, at any time, Project Personnel do not understand or are unclear regarding how or when to implement an environmental protection measure the Environment Department must be contacted to obtain clarification.

1.1 HEALTH, SAFETY AND ENVIRONMENT POLICY

This Baffinland Iron Mines Corporation Policy on Health, Safety and Environment is a statement of our commitment to achieving a safe, healthy and environmentally responsible workplace. We will not compromise this policy for the achievement of any other organizational goals.

We implement this Policy through the following commitments:

- Continual improvement of safety, occupational health and environmental performance
- Meeting or exceeding the requirements of regulations and company policies
- Integrating sustainable development principles into our decision-making processes
- Maintaining an effective Health, Safety and Environmental Management System
- Sharing and adopting improved technologies and best practices to prevent injuries, occupational illnesses and environmental impacts
- Engaging stakeholders through open and transparent communication.
- Efficiently using resources, and practicing responsible minimization, reuse, recycling and disposal of waste.
- Reclamation of lands to a condition acceptable to stakeholders.

Our commitment to provide the leadership and action necessary to accomplish this policy is exemplified by the following principles:

- As evidenced by our motto “Safety First, Always” and our actions Health and Safety of personnel and protection of the environment are values not priorities.
- All injuries, occupational illnesses and environmental impacts can be prevented.
- Employee involvement and active contribution through courageous leadership is essential for preventing injuries, occupational illnesses and environmental impacts.

- Working in a manner that is healthy, safe and environmentally sound is a condition of employment.
- All operating exposures can be safeguarded.
- Training employees to work in a manner that is healthy, safe and environmentally sound is essential.
- Prevention of personal injuries, occupational illnesses and environmental impacts is good business.
- Respect for the communities in which we operate is the basis for productive relationships.

We have a responsibility to provide a safe workplace and utilize systems of work to meet this goal. All employees must be clear in understanding the personal responsibilities and accountabilities in relation to the tasks we undertake.

The health and safety of all people working at our operation and responsible management of the environment are core values to Baffinland. In ensuring our overall profitability and business success every Baffinland and business partner employee working at our work sites is required to adhere to this Policy.

Brian Penney
Chief Executive Officer
April 2018

1.2 ENVIRONMENT APPROVALS

Table 1-1 will list Baffinland's issued Environmental Approvals for the Eqe Bay Exploration Program, once received.

TABLE 1-1: ENVIRONMENTAL APPROVALS ISSUED TO BAFFINLAND

Permit ID	Licence Name	Applicability	Expiry
Nunavut Impact Review Board			
	Screening Decision		
Nunavut Water Board			
	Type B Water Licence	Waste and water management related to the exploration program	TBD
Authorizations under the *Fisheries Act*			
	Letter of Advice for Barge Landing and Culvert Crossings		
Approvals under Nunavut Mine Health and Safety Act			
-	-	In good standing, no changes from previous year.	-
Licence under the Explosives Act			
			-
IOL Land Use Licence			
	Inuit Owned Land Land Use Licence III		

The terms and conditions of these approvals have been incorporated into the OESs provided in this document. Project Personnel are directed to the applicable approvals.

1.3 RESPONSIBILITIES

Vice-President of Sustainable Development

- Provide corporate resources and overall direction to the implementation of the EPP.

Director of Sustainable Development

- Provide technical guidance and final review and approval of revised versions of EPP.

- Ensure EPP is properly communicated to departmental Site Managers and ensure adequate training is in place for all site Supervisors.

Environmental Superintendents and Coordinators

- Conduct a review and revision of the EPP on an as needed basis to determine if updates are required, or at the request of the Environmental Manager.
- Review revisions to the EPP.
- Ensure revisions are distributed to managers and supervisors.
- Perform document controls.
- Ensure that managers, supervisors and their staff are familiar with the EPP and its protection measures.
- Obtain approvals from management.

Site Managers (including Contractors)

- Implement the EPP in daily operations.
- Maintain a current copy of each relevant OES and the Contents and Revision Control List (Section 0).
- Provide training and support to ensure successful implementation of the EPP.
- Initiate changes to improve and update the plan as needed.

Site Personnel

- Familiarization with the relevant sections of the EPP.
- Have knowledge of reporting procedures.

Environmental Consultants

- Provide technical support to EPP development and ongoing revisions.
- Provide audits of EPP implementation, as requested by the VP Sustainable Development.

2 OPERATIONAL ENVIRONMENT STANDARDS

2.1 CULTURAL HERITAGE AND ARCHAEOLOGICAL RESOURCES

A number of cultural heritage and archaeological sites have been identified across the Project Area. The Environment Department will provide information regarding the location of these sites relative to potential work areas. The potential exists to encounter undiscovered cultural heritage or archaeological resources (Chance Finds) when conducting construction activities such as excavating and site clearing.

2.1.1 ENVIRONMENTAL CONCERN

The Eqe Bay Exploration area has been occupied by humans for over 4,000 years. Archaeological sites are very common throughout the region, mostly consisting of stone structures that usually represent tent rings and shelters, caches, traps, hunting blinds, cairns and *inukshuks*. Stone tool making sites are also present. These types of archaeological sites and features are often difficult to recognize. All archaeological sites are valuable, non-renewable sources of information about local people's history and provide crucial data for scientists studying Northern ways of life throughout the past. It is against territorial law to disturb known or suspected archaeological sites, punishable by fine or imprisonment. Many areas of the Project have not been surveyed by a qualified archaeologist; therefore Project Personnel must obtain approval from the Environment Department before traveling off of existing roads or disturbing ground surfaces.

The Eqe Bay Exploration Area is expected to have a high overall archaeological potential. Surveys are being undertaken in July or August 2018, and may involve revisions to this OES.

2.1.2 ENVIRONMENTAL PROTECTION MEASURES

The following measures will be implemented to minimize the potential for impacting an archaeological site:

- Project Personnel shall not deviate from already disturbed areas or established routes (existing roads and camp areas).
- Cultural resources discovered during project activities (Chance Finds) shall be reported to the Environment Department who will develop a course of action in consultation with the Project Archaeologist
- Upon a discovery, a Cultural Heritage Chance Find Discovery Report (Section 3.1) must be completed and submitted to the Environment Department.
- Human remains and funerary objects shall be treated with dignity and respect at all times, regardless of ethnic origins, cultural backgrounds or religious affiliations.
- Artifacts shall be left where they are found. If artifacts are disturbed or removed, their location shall be reported to the Environment Department
- Archaeological site locations shall be kept confidential to prevent unauthorized collection or disturbance of artifacts.

- Known sites near Project activities will be marked by stakes, flagging and/or yellow rope at approximately 30 metres away from each site.
- All Project Personnel shall avoid and remain more than 30 m away from all known or suspected archaeological sites, staying well away from any temporary protection measures such as flagging, stakes and/or yellow rope fencing.
- Existing inukshuks shall not be modified or disturbed. New inukshuks or rock piles shall not be constructed since building new rock piles may clutter the archaeological record and/or result in unknowingly using rocks from existing archaeology sites.
- Known archaeological sites shall be avoided by re-routing roads and establishing borrow excavations at locations approved for use by the Project Archaeologist. Sites that can't be avoided will be mitigated by the archaeology team prior to construction activities.
- If suspected archaeological or human remains (structures, artifacts or bones) are unearthed during work operations, stop work immediately and notify the Environment Department. The Environment Department will in turn contact the Project Archaeologist and the appropriate lands inspector and the Government of Nunavut, as required by law. The Project Archaeologist shall complete an archaeological review of all proposed Project Areas as they are finalized to identify areas with possible conflicts and areas where Project activities may proceed.

2.1.3 FORMS

- Baffinland EPP - Cultural Heritage Chance Find Discovery Report (Section 3.1)

2.2 AVOIDING DISTURBANCE TO LOCAL LAND USERS

2.2.1 ENVIRONMENTAL CONCERN

Land and resource use in the Project Area includes hunting, fishing, trapping and tourism. While the Eqe Bay Exploration Area is not currently a high use area, it should be expected that other land users could enter the area at any time. Baffinland is committed to minimize disturbance to land users to the extent possible.

2.2.2 ENVIRONMENTAL PROTECTION PROCEDURE

Measures will be implemented to minimize disturbance to existing land use patterns for the duration of the Project. These measures include:

- Aircraft will fly in accordance with guidelines outlined in the Aircraft Flights Operational Environment Standard (Section 2.8).
- Road traffic will operate in accordance with guidelines outlined in the Road Construction and Borrow Development OES (Section 2.17).
- Pilots and others will record the presence of other land users in the Human Use Log (Section 3.2) posted at each site, and will notify the Environment Department of any sightings.
- Land users are encouraged to record their presence using the Human Use Log (Section 3.2) posted at each Project Site.
- Any disruptions to land use will be documented so that this information can be considered in subsequent phases of project development.

2.2.3 FORMS

- Baffinland EPP - Human Use Log (Section 3.2)

2.2.4 RELATED DOCUMENTS

- Baffinland EPP - Aircraft Flights (Section 2.8)

2.3 LAND DISTURBANCE

Ongoing development of the Eqe Bay Exploration area will require ground disturbances, including camp and road construction, quarrying and mobile vehicle operation.

2.3.1 ENVIRONMENTAL CONCERN

The Arctic is a fragile environment where the recovery of vegetation within this region is slow. Ground disturbance shall be minimized to protect archaeological resources, wildlife habitats, sensitive landforms, such as ice-rich permafrost features, and prevent erosion and the movement of sediment into watercourses and water bodies. Conditions provided in Baffinland's permits, licences and authorizations address ground disturbances and outline the necessary protection measures that are required to minimize impact to the environment.

2.3.2 ENVIRONMENTAL PROTECTION PROCEDURE

The following measures shall be implemented to minimize potential ground disturbances:

- Project Personnel and equipment shall remain on only existing roads and trails.
- Modifications to any design/engineering drawings must be approved by the Environment Department before any Work on the modification may be started.
- Rutting (furrow creation) shall be minimized on ground surfaces when possible.
- All camps and equipment storage areas shall be located on gravel, sand and/or other durable land.
- No materials shall be stored on the surface ice of streams.
- No material shall be removed from below the ordinary High Water Mark of any stream or water body.
- Greywater sumps must be located at distance of at least 31 metres above the ordinary High Water Mark of any water body.
- Equipment and supplies brought to Project sites shall be clean and free of soils that could contain plant seeds not naturally occurring in the area. Vehicle tires and treads in particular must be inspected prior to initial use in Project Areas.
- Prior to construction activities, a site drainage drawing must be submitted to the Environment Department for approval.
- The limits for all clearing, grubbing and topsoil overburden removal shall be staked in the field prior to the commencement of any Work.
- Areas to be cleared shall have sediment and erosion control measures implemented prior to the initiation of any clearing activities. The sediment and erosion control measures shall be adapted to suit the field conditions associated with the specific construction activities as construction proceeds.
- No debris or any other construction material shall be allowed to enter any water body.
- New equipment entering the site will be examined for invasive species.

- A Baffinland Incident Investigation Form (BAF-PH1-810-FOR-0005) will be completed for all non-approved land disturbances.

2.3.3 FORMS

- Baffinland - Incident Investigation Form (BAF-PH1-810-FOR-0005)

2.3.4 RELATED DOCUMENTS

- Baffinland EPP – Cultural Heritage and Archaeological Resources (Section 2.1)
- Baffinland EPP – Sediment and Erosion Control (Section 2.9)
- Baffinland EPP – Road Construction and Borrow Development (Section 2.17)

2.4 WATER USE

2.4.1 ENVIRONMENTAL CONCERN

Water is an important resource that must be protected. The use of water by Baffinland for the Project will be governed by a Type B Water Licence issued to the Company by the Nunavut Water Board (NWB). In addition to regulating water usage, Baffinland's water licences regulate many aspects of the Company's waste management practices, construction and operation activities, aquatic effects monitoring, emergency response planning and the abandonment, reclamation and closure of the Project.

This Operational Environment Standard highlights the key terms and conditions of Baffinland's water licences and other approvals governing water use.

2.4.2 ENVIRONMENTAL PROTECTION MEASURES

CAMP WATER SUPPLY

- Only approved water sources shall be used for Project activities.
- The Eqe Bay Exploration Camp will obtain water from unnamed lake EB-2.
- Water supply facilities are to be maintained to the satisfaction of the INAC Inspector.
- Total volumes of water withdrawn from any water body by Baffinland will be recorded and provided to the Environment Department upon request using the Water Collection Log (Section 3.3).
- Daily water usages volumes for Project Sites shall not exceed volumes outlined in Baffinland's Type B Water Licence, as shown below in TABLE 2.4- 1

TABLE 2.4- 1: WATER USE FOR DOMESTIC AND INDUSTRIAL PURPOSES

Project Site	Maximum Daily Water Usage (m^3 per day)
Exploration Camp	29
Drilling	270

- Streams cannot be used as a water source unless authorized and approved by the Nunavut Water Board.
- If water is required from a source that may be drawn down (small lake or stream), Baffinland shall submit a request for approval to the Board 15 days prior to withdrawing the water.
- Work shall be performed in such a way as to ensure that materials such as sediment, fuel or any other hazardous material do not enter watercourses and waterbodies through the implementation of sediment control measures and proper hazardous materials management practices. In the event of a release to the environment, a spills contingency plan shall be implemented.
- All water intake hoses shall be equipped with a screen of an appropriate mesh size (as approved by the DFO) to ensure that fish are not entrained. Additionally, operators will ensure the water intake hoses withdraw water at such a rate that fish do not become impinged on the screen.
- Measures shall be provided to prevent and control erosion on banks of any body of water.
- Equipment shall not be washed in any watercourse or waterbody.
- No fuelling and/or servicing of equipment shall occur within 31 metres of any water body.

For water use associated with drilling programs, see Exploration Drilling Operations (Section 2.18).

2.4.3 FORMS

- Baffinland EPP – Water Collection Log (Section 3.3)

2.4.4 RELATED DOCUMENTS

- Baffinland EPP – Sediment and Erosion Control (Section 2.9)
- NWB - Type B Water Licence (2BE-XXXXXXX)

2.5 GEOTECHNICAL DRILLING OPERATIONS

Geotechnical drilling may be required to obtain soil and rock samples necessary for engineering and designing the Project facilities and infrastructure.

2.5.1 ENVIRONMENTAL CONCERN

Environmental concerns associated with drilling include surface disturbances, drilling fluid and cutting disposal, impacts on dust, noise, water quality, and habitat encroachment. The use of water for drilling purposes is subject to the conditions outlined in Baffinland's Type B Water Licence (2BE-EQEXXXX).

2.5.2 ENVIRONMENTAL PROTECTION MEASURES

The following protection measures for geotechnical drilling management shall be implemented:

- Pre-Drilling Preparation and Acceptable Drill Locations:
  - A Pre-Drilling Inspection Report (see Section 3.4) shall be completed by the acting supervisor before drilling activities commence.
  - Additional geotechnical investigations shall be undertaken to identify sensitive landforms, modify engineering design for Project infrastructure, develop and implement preventative and/or mitigation and monitoring measures to minimize the impacts of the Project's activities and infrastructure on sensitive landforms.
  - Geotechnical drilling activities may be carried out within 31 m of the ordinary High Water Mark of waterbodies as long as the drilling location has been approved by the Nunavut Water Board. Please confirm all geotechnical drill locations with the Environment Department before drill mobilization.
  - Archaeology clearance shall be obtained from the Environmental Department for all geotechnical drill locations (see Section 2.1).
  - Conduct a wildlife inspection immediately prior to movement of the drill, involving aerial and ground survey of the new site. For details on drilling restrictions associated with wildlife interactions, see Operational Environment Standards: Polar Bear Encounters (Section 2.10), Fox and Wolf Encounters (Section 2.11), Caribou Protection Measures (Section 2.12) and Bird Protection Measures (Section 2.13).
  - Implement sediment and erosion control measures prior to drilling operations and maintain these during the operation to minimize transport of sediment into adjacent water bodies. Prior to the commencement of drilling for each hole, establish a dedicated sump location where collected "dirty" drill water and cuttings are to be disposed. The location shall be a minimum of 31 m from surface water bodies and located such that any flow toward a surface water body is minimized (sump shall be in a bowl, depression or be on a flat surface).
- Drill Operation and Movements:
  - Material shall not be stored on the surface of frozen streams or lakes, including immediate banks, except materials that are for immediate use.

- All drill waste, including water, chips, muds and salts ($CaCl_2$) from land based drilling shall be disposed in a properly constructed sump or natural depression located at least 31 m above the High Water Mark of any water body.
- All activities, including the overland transport of workers, shall be conducted in such a way to minimize ground disturbance.
- All waste, such as food and packaging, shall be collected for disposal at the camp.
- Feeding of all wildlife is prohibited.
- Equipment or vehicles shall not be moved unless the ground surface is in a state capable of fully supporting the equipment or vehicles without rutting or gouging.
- Daily inspections for fuel/hydraulic leaks, equipment condition, sediment and erosion control, and water intakes shall be conducted prior to commencing Work activities at the start and end of each work shift/day. All leaks shall be immediately repaired.
- All drill rigs shall be equipped with spill kits in the event of leaks and spills. All operators should be trained in spill response and be familiar the use of spill kits.
- In case the bottom of the permafrost is broken through by the drill, the depth of the bottom and location shall be reported immediately to the Environment Department who shall in turn report to the Nunavut Water Board.
- Equipment shall not obstruct any stream.
- Equipment storage holding areas will be located on gravel, sand or other durable land 31 m above the ordinary High Water Mark of any waterbody in order to minimize impacts on surface drainage and water quality.
- Establish water quality conditions prior to and upon completion of any on-ice drilling program See Operational Environment Standard: Water Sampling for On-Ice Drilling (Section 2.22) for more details.
- Contain and re-circulate drill water to the fullest extent possible in order to reduce water usage. Utilize silt fences and natural depressions to prevent water from running into nearby watercourses and water bodies.
- Separate clean water from “dirty” water streams whenever possible, (by means of hose extensions and snow berms or other means that direct and keep discharge away from the immediate area of the drill hole) to prevent migration and expansion of a “dirty” water plume.
- Work shall be performed in such a way as to ensure that materials such as sediment, fuel and/or any other hazardous material does not enter watercourses and waterbodies through the implementation of sediment control measures and proper hazardous materials management practices. In the event of a release to the environment, the approved Spills Contingency Plan shall be implemented.
- To maximize drill return water recirculation, casing is to be frozen into the ground to a depth of 3 to 6 m below grade. The specific depth of casing to be frozen into each hole and length of time to allow for freezing will be specified by the acting Supervisor.

- The drill water and cuttings spillage footprint shall be minimized through the use of berms, silt fences and/or other means of containment.
- Dispose of drill water into a properly constructed sump, or a naturally occurring contained depression. Drill water shall not be released directly to a nearby water course or to the ground.
- Use portable containment sumps (bins), for drill water and cuttings where containment in the ground is impractical. The bins shall not overflow and shall be dumped by means of helicopter or pump, to the location identified for disposal of dirty drill water and cuttings.
- Drilling waste must not be allowed to spread to the surrounding land or water bodies; the footprint of any spillage must be minimized to the greatest degree practicable.
- In case of an artesian flow occurrence, drill holes shall be immediately plugged and permanently sealed to prevent induced contamination of groundwater or salinization of surface waters. Report the artesian flow occurrence as soon as possible to the Environment Department who in turn will report the occurrence to the Nunavut Water Board.
- For on-ice drilling, returned water released must be nontoxic, and not result in an increase in Total Suspended Solids (TSS) in the immediate receiving water above the CCME guidelines for the protection of Fresh Water Aquatic Life (i.e., 10 mg/L for lakes with background levels under 100 mg/L or 10% for those above 100 mg/L).

- Drill Hole Abandonment:
  - Materials such as debris and/or drill cuttings shall not be left on the ice when there is potential for that material to enter a water body.
  - Restore, contour and stabilize constructed drill sumps, and other disturbed areas, to the pre-disturbed state immediately upon completion of drilling.
  - Return all combustible waste and petroleum products to camp for proper management and disposal.
  - Plug all drill holes upon completion, and where possible return drills cuttings at the surface to the drill hole at all land-based drilling locations.
  - Contour and stabilize all other disturbed areas upon completion of work and restore these areas to a pre-disturbed state.
  - Upon completion of a hole in rock, the casing will be removed. If the casing cannot be removed it will be cut off to be flush with surface and backfilled.
  - Remove all non-combustible garbage and debris from the land use area to an approved disposal site.
  - A Post-Drilling Inspection Report (see Section 3. – Drill Inspection Forms - Pre-Drilling, Daily and Post Drillings) will be filled out at the completion of each drill hole.
  - Ensure a copy of all Pre-Drilling, Post-Drilling and Daily Drill Inspection Reports for all drill holes are submitted to the Environment Department at the completion of each drilling program.

2.5.3 FORMS

- Baffinland EPP – Drill Inspection Forms: Pre-Drilling, Daily and Post Drilling (Section 3.5)

2.5.4 RELATED DOCUMENTS

- Baffinland EPP – Sediment and Erosion Control (Section 2.9)
- Baffinland EPP - Polar Bear Encounters (Section 2.10)
- Baffinland EPP - Fox and Wolf Encounters (Section 2.11),
- Baffinland EPP - Caribou Protection Measures (Section 2.12)
- Baffinland EPP - Bird Protection Measures (Section 2.13)
- Baffinland EPP – Exploration Drilling Operations (Section 2.21)
- NWB - Type B Water Licence (2BE-EQEXXXX)
- Eqe Bay Spill Contingency Plan (BAF-PH1-XXX-XXX-XXX)

2.6 EQUIPMENT OPERATION AND MOBILIZATION

2.6.1 ENVIRONMENTAL CONCERNS

Mobile equipment emits noise and air emissions, are potential sources of leaks and spills and can cause rutting and land disturbances, as well as disturbance of archaeological sites if necessary clearances have not been obtained.

Noise associated with equipment use and mobilization may negatively affect neighbours. Air emissions may have air quality implications. Accidental leaks or spills of fuel or other hazardous materials may affect soils, water quality, fish and fish habitat, and wildlife.

2.6.2 ENVIRONMENTAL PROTECTION MEASURES

- Damage to archaeology sites will be avoided by following the protection measures outlined in the Operational Environment Standard: Cultural Heritage and Archaeology Resources (Section 2.1).
- Rutting and land disturbance will be minimized by following the protection measures outlined in the Operational Environment Standard: Land Disturbance (Section 2.3).
- All equipment will be equipped with properly functioning mufflers.
- All spills involving equipment shall be reported to the Environment Department immediately and documented by submitting the necessary documentation within 12 hours of the spill using the Baffinland Incident Investigation Form (BAF-PH1-810-FOR-0005) and NT-NU Spill Report Form (Section 3.6). See Operational Environment Standard: Spill Control Measures and Reporting (Section 2.33) for more details on spill reporting.
- Daily pre-operation inspections will be made on all equipment using the Pre-Op Inspection Form. Pre-Op Inspection Forms should be given to the Maintenance Department at the end of day. If problems are identified the Maintenance Department should be notified and the equipment will be taken out of service and repaired.
- Equipment operators will be trained and licenced to operate their particular equipment; training will be provided for operators before operating any new equipment.
- Equipment and vehicles that will remain parked for extended periods of time or that are prone to leaks will have spill trays placed underneath them to contain any fluid leaks.

2.6.3 FORMS

- Baffinland – Baffinland Incident Investigation Form (BAF-PH1-810-FOR-0005)
- Baffinland – NT-NU Spill Report Form (Section 3.6)
- Baffinland – Pre-Op Inspection Form

2.6.4 RELATED DOCUMENTS

- Baffinland EPP – Cultural Heritage and Archaeological Resources (Section 2.1)
- Baffinland EPP – Land Disturbance (Section 2.3)
- Baffinland EPP – Spill Control Measures and Reporting (Section 2.33)

2.7 FUEL STORAGE AND HANDLING

Small quantities of fuel are being stored in barrels and double walled ISO tanks within constructed containment berms at the Eqe Bay Exploration Area camp.

2.7.1 ENVIRONMENTAL CONCERNS

Accidental and uncontrolled leaks, releases and spills of fuel may occur due to improper storage, poor handling procedures or equipment malfunction. Fuel releases to the environment have the potential to negatively affect worker health and safety as well as soil quality, aquatic life and wildlife. The potential for fuel spills is addressed through the Company's Emergency Response and Spill Contingency Management Plans.

2.7.2 ENVIRONMENTAL PROTECTION MEASURES

The following environmental protection measures shall be used for all storage and handling of fuels at the the Eqe Bay Exploration area:

- Personnel refuelling equipment or vehicles will supervise re-fuelling at all times and will not leave fuel transfer operations unattended.
- Avoiding ship-to-shore transfer of fuel during freeze-up or break-up periods.
- Undertake fuel transfer from vessels to shore under good weather conditions.
- Transfer of fuel to storage tanks or to vehicles shall be conducted by a fully-trained and qualified person.
- Exposed pipelines shall be protected from damage by vehicular collision through the installation of guard rails or barriers.
- Hoses and pipes used for fuel transfer shall be equipped with properly functioning and approved check valves that are spaced to prevent backflow of fuel in the case of failures.
- All spills shall be reported to the Environment Department immediately and documented by submitting the necessary documentation within 12 hours of the spill to using the Baffinland Incident Investigation Form (BAF-PH1-810-FOR-0005) and NT-NU Spill Report Form (Section 3.6). See Operational Environment Standard: Spill Control Measures and Reporting (Section 2.33) for more details on spill reporting.
- All fuel storage tanks will be inspected on a regular basis and will be in accordance with the requirements outlined in the Environmental Code of Practice for Aboveground Storage Tank Systems Containing Petroleum Products, issued by the Canadian Council of Ministers of the Environment.
- Fuel storage containers will be stored in secondary containment and shall not be placed within 31 m of ordinary High Water Mark of any water body.

- All mobile equipment will be serviced and fuelled on land at least 31 m above the ordinary High Water Mark of any water body No petroleum or chemical product will be allowed to spread to surrounding lands or into water bodies.
- All fuel containers shall be sealed and labelled with the name Baffinland Iron Mines Corporation.
- Waste oils, lubricants, and other used oil shall be placed in drums, labeled as waste materials, and stored in a contained area until removed from site for disposal at an approved, licenced waste management facility (Section 2.16 - Hazardous Material & Hazardous Waste Management).
- All fuel storage areas shall be inspected on a regular basis. See Operational Environment Standard: Compliance Inspections (Section 2.32). Examine all fuel storage containers in your work area for leaks at least once per day.
- Repair all leaks immediately.

2.7.3 FORMS

- Baffinland – Baffinland Incident Investigation Form (BAF-PH1-810-FOR-0005)
- Baffinland – NT-NU Spill Report (Section 3.6)

2.7.4 RELATED DOCUMENTS

- Baffinland EPP – Hazardous Material & Hazardous Waste Management (Section 2.16)
- Baffinland EPP – Spill Control Measures and Reporting (Section 2.22)
- Baffinland – Eqe Bay Spill Contingency Plan (BAF-PH1-XXX-XXX-XXX)
- NWB - Type B Water Licence (2BE-EQEXXXX)

2.8 AIRCRAFT FLIGHTS

The construction and operation phases of the Eqe Bay Exploration involves air traffic consisting of flights made by helicopters and smaller twin-engine fixed wing aircraft. The high level of aircraft use requires pilots, and Project Personnel directing pilots, to be aware of the potential disturbances to wildlife and the requirements of the various permits and licences issued to Baffinland. Additionally, Inuit hunters may be moving through the Eqe Bay Exploration Area at any time of the year, and Baffinland has committed to minimizing disturbance of local users to the extent possible. All personnel are responsible for operating in accordance with the legal requirements and commitments outlined in this Operational Environment Standard. However, that being said, safety is the most critical aspect of aircraft operations and safety considerations supersede other concerns.

2.8.1 CONCERNS REGARDING WILDLIFE

Aircraft can cause disturbance to wildlife by interrupting their activities (i.e. feeding, calving, migration, etc.) and possibly causing the animals to leave an area and important habitats. Caribou, important to Inuit culture and diet, can be sensitive to aircraft noise. Disturbance of caribou has the greatest effect prior to, during and following calving (approximately mid-May to mid-July). Migratory birds are also disturbed by low-level overflights.

2.8.2 CONCERNS REGARDING INUIT LAND USE

Aircraft can disturb hunters or other land users (i.e. tourists) during low level flights that disturb the people and/or the wildlife they may be pursuing. Land users travel over land and ice from roughly late November through late June/early July. August is particularly important for boats due to the short duration of open water. Land users may travel by boat and camp in the area, and may travel inland hunting caribou by walking or using all-terrain vehicles. Remember that local land users were here first.

2.8.3 ENVIRONMENTAL PROTECTION MEASURES

- Minimize the number of flights to the extent possible.
- Subject to safety requirements, aircraft will maintain a cruising altitude of at least:
  - 650 m above ground level minimum, and;
  - 1,100 m vertical and 1,500 m horizontal from observed concentrations of migratory birds. If altitude is not possible, maintain a lateral distance of at least 1,500 m.
  - In July and August, either avoid travelling over, or use a minimum of 1,100 m vertical when travelling over the Snow Goose Area

- Ensure that certification of noise compliance is current, where compliance is applicable.
- Employees are responsible for reporting to the appropriate supervisor any improper flight practices.
- Avoid caribou calving sites between May 15 and July 15, as identified by Project biologists or observed by aircraft pilots.
- Pilots shall report to the Environment Department caribou movements and locations during calving and post-calving periods, so that these areas can be avoided.
- Avoid large concentrations of wildlife and take alternate routes.
- Plan routes that are likely to have least occurrences of wildlife.
- Hovering or circling may greatly increase disturbances and must be avoided when practical.
- The Environment Department will inform pilots of wildlife sensitive area.
- For details on reporting wildlife sightings, refer to Operational Standard: Wildlife Log Instructions (Section 2.19)

2.8.4 EXCEPTIONS

- Low-level flights are required during slinging operations in the vicinity of the Eqe Bay Exploration area camp and on occasion at other locations, or where short distances are involved.

2.8.5 FORMS

None

2.8.6 RELATED DOCUMENTS

- Baffinland EPP - Polar Bear Encounters (Section 2.10)
- Baffinland EPP - Fox and Wolf Encounters (Section 2.11)
- Baffinland EPP - Caribou Protection Measures (Section 2.12)
- Baffinland EPP - Bird Protection Measures (Section 2.13)

2.9 SEDIMENT AND EROSION CONTROL

Land disturbances during road construction and operation, culvert installation and excavation of borrow locations and quarries have the potential to cause erosion and release sediment-laden runoff into nearby watercourses. Sediment and erosion control measures may include, but are not limited to, silt fencing, erosion control mats (fascines), sedimentation ponds, erosion blankets/geotextile lining, sand bags, terraces, benching, use of flocculants and riprap structures. Personnel are responsible for the implementation of erosion and sedimentation control measures prior to the initiation of construction activities and during ongoing mining Operations (i.e., clearing, grubbing, development of facilities, etc.) in each specific work area.

2.9.1 ENVIRONMENTAL CONCERN

The potential exists for the movement of soil (wind erosion), the unplanned release of sediment to watercourses/waterbodies and the slumping or change in landscape form associated with changes in the permafrost profile. Stormwater, which may include any surface runoff and flows resulting from precipitation, drainage or other sources, may contain suspended sediments, metals, petroleum hydrocarbons, and other substances. These materials may affect water clarity and, subsequently, aquatic life by reducing feeding success, fish egg and larval survival and fish habitat. Rapid runoff can degrade the quality of the receiving water by eroding stream beds and banks. Wind erosion is a key issue for the Project. The arid climate allows the wind to transport unprotected/disturbed soils from current locations. Improved road surfaces will increase potential runoff in downstream areas throughout the Project Area.

2.9.2 ENVIRONMENTAL PROTECTION MEASURES

As required, personnel may be instructed to implement additional sediment and erosion control measures by the Environment Department to ensure protection of the environment.

The following environmental protection procedures/measures will be taken to prevent or mitigate erosion and sediment-laden runoff impacts:

- The size of the disturbed area and duration of soil exposure shall be limited as specified in the construction schedule and “Issued for Construction” drawings.
- Road embankments, watercourse crossing installations and borrow areas shall be constructed in accordance with approved plans and procedures.
- Temporary and permanent drainage installations shall be designed, constructed, and maintained to an appropriate standard.
- The topsoil/overburden stockpiles shall be contoured, where possible, with established drainage routes around the stockpiles, as specified by the Environment Department.
- Stream bank sections and slopes that contain loose or erodible materials shall be stabilized through the application of filter fabrics or geotextile in conjunction with riprap. Sediment control

measures will be installed prior to watercourse crossing installations (Section 2.18 - Tote Road Watercourse Crossing Installation).

- Appropriate sediment and erosion control measures will include a combination of silt fences, silt (turbidity) curtains, sediment traps, settling ponds and gravel berms.
- Access and haul roads shall be constructed with gradients or surface treatment and drainage systems to limit the potential for run-off and erosion.
- Borrow activities will be concentrated to the maximum extent possible to limit the area of disturbance.
- At borrow areas, drainage patterns will be re-established to near natural conditions.
- Turbidity monitoring will be conducted at watercourses by Environmental Monitors during and after construction activities when necessary.
- Project Personnel shall maintain, as required, all sediment and erosion control measures following rain or storm events to minimize further environmental damage. All repairs shall be undertaken under the direction and to the satisfaction of the Environment Department.

2.9.3 FORMS

None

2.9.4 RELATED DOCUMENTS

- Baffinland EPP – Road Construction and Borrow Development (Section 2.17)

2.10 POLAR BEAR ENCOUNTERS

2.10.1 ENVIRONMENTAL CONCERN

Polar Bear encounters at the Eqe Bay Exploration area pose an immediate threat to life, health, safety, environment and property. Therefore, the Polar Bear Safety Plan (Plan) is to be used in conjunction with Baffinland's Emergency Response Plan (BAF-PH1-830-P16-0007) which provides the following guidance:

- Ensure the safety and well-being of personnel, the environment, and property
- Identify the types of emergencies that may occur and the procedures to respond, intervene, stop, or limit the emergency situation
- Ensure effective communication between personnel and the mine rescue team
- Ensure that personnel responding to emergencies are trained and have appropriate resources for the response

Polar bears are protected in Canada where they are legally hunted. Seasons, protected categories and quotas apply. The purpose of the Wildlife Act (statute of Nunavut) is to establish a comprehensive regime for the management of wildlife and habitat. The legislation provides that it is legal for anyone to attempt to deter, and if necessary destroy, a bear in defense of life or property. Any bear killed must be reported to the nearest conservation officer. It is an offense to allow the hide of a polar bear to spoil.

Site Personnel are required to comply with the requirements provided in the Polar Bear Protection Plan.

2.10.2 ENVIRONMENTAL PROTECTION MEASURES

The following measures must be implemented to minimize the potential for bear-human encounters:

- Site and working areas will be kept clean of food scraps and garbage at all times. Effective waste management is paramount to reducing the likelihood of encounters.
- Do not attempt to chase, catch or follow polar bears under any circumstance.
- Polar bears that attempt to approach work sites or personnel must be actively deterred by shouting or use of noise makers such as bear bangers whenever possible.
- All polar bear sightings must be reported immediately to the Environmental Superintendent or his designate, regardless of the time of day.
- Bear monitors will be posted at coastal locations and will accompany remote field crews that do not have full-time air support.
- The Environmental Superintendent or his designate will authorize and coordinate the use of deterrent measures. A defence kill is to be used as an absolute last resort only when there is an imminent risk to human safety
- Helicopters may be used to haze/deter polar bears away from camps only under the authorization and direction of the Environmental Superintendent or his designate.

- Any defensive kills must be reported immediately to the Environmental Superintendent or his designate, who will notify the Qikiqtani Inuit Association (QIA), Hunters and Trappers Organization (HTO), wildlife officer and other stakeholders as required. The Inuit Impact Benefit Agreement (IIBA) outlines the protocol to be followed in the event of a defensive kill. The meat must not be allowed to spoil and the animal will need to be dressed immediately and the meat and pelt appropriately stored until transportation is available to the designated affected community, in accordance with the IIBA.
- Polar bear safety is a part of the Site Orientation Program.
- Please refer to the Polar Bear Safety Plan that has been developed for more information on mitigation measures and safety measures pertaining to polar bear encounters.
- Routine completion of a Polar Bear Readiness Audit to ensure that all Polar Bear incidents are documented and promptly reported to regulators and that all preparation and requirements regarding Polar Bear mortalities are in place.

2.10.3 FORMS

- Polar Bear Readiness Audit Form (Section 3.9)

2.10.4 RELATED DOCUMENTS

- Baffinland - Polar Bear Safety Plan (BAF-PH1-830-P16-0041)
- Inuit Impact Benefit Agreement
- QIA Directive 2013-1-17-2
- Polar Bear Readiness Procedure and Audit (Appendix A)

2.11 FOX AND WOLF ENCOUNTERS

2.11.1 ENVIRONMENTAL CONCERN

Foxes and wolves can become habituated to sites where they can access food and food waste. This situation can arise from intentional feeding by personnel or improper waste management practices. Once such food conditioning has occurred, these animals lose their fear of humans and may approach Project Personnel in an aggressive fashion. Rabies is usually endemic in fox populations. Habituated foxes that act aggressively need to be dealt with immediately.

2.11.2 ENVIRONMENTAL PROTECTION MEASURES

The following measures will be implemented to minimize potential impacts to foxes and wolves and the associated risk to the health and safety of personnel:

- Site and working areas will be kept clean of food scraps and garbage. All waste will be disposed of at the Eqe Bay Exploration area camp incinerator, or securely stored for off-site disposal.
- Wildlife will not be intentionally fed under any circumstances. The consequences of such actions will lead to major disciplinary action.
- Solid carnivore proof skirting shall be installed on all kitchen and accommodation buildings to prevent foxes from venturing under buildings.
- Fox and wolf sightings should be recorded in the Wildlife Log (see Section 3.2) at camp. Wolf sightings should be reported to the Environment Department immediately.
- Wildlife attempting to approach personnel will be deterred by shouting, chasing and using noise makers, such as bear bangers. Should those deterrents not work, the site Environmental and Health & Safety Supervisors will be notified immediately for their assessment. Typically, wolves can be readily deterred by the above methods. Based on site experience, foxes are less responsive to deterrence. Due to the high incidence of rabies in foxes on Baffin Island, foxes that exhibit aggressive behaviour to humans, regardless of deterrence measures, are presumed to be rabid. The Environmental and Health & Safety Supervisors will assess the situation and make the recommendation for or against dispatching a likely rabid fox by lethal shot.
- In the rare situation where a lethal shot is necessary, approval to proceed will be provided by the Environment Supervisor for the location. Only personnel authorized and trained in the use of firearms will be used. This task will be executed so that Project Personnel, equipment and infrastructure are not endangered. If rabies is suspected, a body shot will be taken, and the carcass will be handled to avoid direct physical contact. The carcass will be incinerated immediately, and the Conservation Officer in Pond Inlet will be notified.
- Fox and wolf interactions with Project activities will be documented and included in the Wildlife Logs (see Section 3.2) and annual reports.

- No drilling activity should take place within 2 km of an active wolf den between mid-May and mid-August if direct line of sight and disturbance is noted. Contact on-site Environment staff to determine if a den is in the vicinity of operations.
- Qualified biologists will survey for carnivore (wolf and fox) dens, and an avoidance zone will be identified in consultation with the Project biologist. Den locations will be identified and Project Personnel advised accordingly. All Project personnel will adhere to wildlife and den avoidance guidelines during the denning season.

2.11.3 FORMS

- Baffinland EPP – Wildlife Log (Section 3.10)

2.11.4 RELATED DOCUMENTS

- Baffinland EPP – Wildlife Log Instructions (Section 2.23)

2.12 CARIBOU PROTECTION MEASURES

2.12.1 ENVIRONMENTAL CONCERN

Caribou are currently present in relatively low numbers in the Eqe Bay Exploration Area, but their numbers and encounter rates are expected to increase through the life of the Project. Caribou harvesting is important to local communities, so there is added importance to ensuring that the Project operates with minimal potential effects on caribou. The potential effects on caribou include those from disturbance, primarily due to noise and other sensory disturbances from project activities. The primary mitigation for caribou is avoidance followed by monitoring.

A Zone of Influence (ZOI) of 3 km from exploration activities has been defined for stationary activities such as camps, mining and drilling during the pre- to post-calving time period of May 15 to July 15. At other times of the year the caribou are less sensitive and a ZOI of less than 3 km is likely.

2.12.2 ENVIRONMENTAL PROTECTION MEASURES

The following measures will be implemented to minimize disturbance to caribou:

- Employees that are not Nunavut Land Claim beneficiaries will not be permitted to hunt or fish on any land accessed from the Project. All personnel shall return home between shift rotations and shall not be permitted to stay in the area to hunt or fish as part of their shift rotations.
- Mobile equipment and vehicles shall yield the right-of-way to wildlife.
- Traffic is to slow down and keep distance from the animals as much as possible. If necessary, traffic will stop to enable crossings of groups or to allow groups of caribou paralleling the road to move into adjacent habitat. Caribou occurrence in the vicinity of the road and their responses to traffic will be monitored by on the ground behavioral observations, to determine if it is apparent that caribou are being disturbed or displaced by construction or traffic. Specific guidance is provided in the Caribou Encounter Decision Tree located in Appendix B.
- All caribou sightings will be reported to the Environment Department and they will keep geo-referenced records of caribou sightings. This will enable Project biologists to monitor caribou activity in relation to the Project.
- Active caribou calving sites (as identified by Project biologists or observed by aircraft pilots) will be avoided between May 15 and July 15, and where possible, there will be no increase in mine construction or operational activity within 3 km of the calving sites during this time period.

- If any females (one or more) are observed within 3 km of a planned project activity such as drilling or road construction from May 15 through to July 15, then the activity location will either be moved or the activity deferred as appropriate and if possible, until a later date when caribou are not present.
- Should a female caribou or a female with calves approach within 3 km of project activities (between May 15 and July 15), the animals will be observed on the ground. If it is obvious they are being disturbed, the activity will cease until they have moved at least 3 km away.
- If caribou approach a project activity site before work commences, the Environment Department shall be notified immediately and will determine the necessary measures that need to be taken to protect caribou activity.
- If caribou approach a project site while work is in progress, caribou will be observed for signs of disturbance.
- If the caribou are disturbed, the activity will be modified or cease until the caribou have moved away or they are guided away from the worksite.
- If caribou are observed within 3 km of a proposed new drill site and disturbance is noted, the drill should be moved to an alternative location and activity at the site deferred until after the caribou leave the area. If the drill is already in place and operating, and caribou move into the area, the animals should be monitored by the Project biologist or on-site Environmental personnel. If the caribou show no obvious signs of disturbance, drilling activities can continue. If the animals appear agitated, then activities must cease until the caribou leave.
- A wildlife monitor will be periodically present on site during the calving season to detect calving activities near the Tote Road, monitor cow/calf behavior in relation to traffic, designate a temporary no-stopping zone, guide traffic and document measures taken to reduce sensory disturbance to calving caribou.
- Monitoring and Mitigation measures will be implemented at points where the roads, trails and flight paths pass through caribou calving areas, particularly during caribou calving times.
- Protocols will be implemented for documentation and reporting of all caribou collisions and mortalities as well as mechanisms for adaptive management responses designed to prevent further interactions.

2.12.3 FORMS

- Baffinland EPP – Wildlife Log (Section 3.10)

2.12.4 RELATED DOCUMENTS

- Baffinland –Terrestrial Environment Mitigation and Monitoring Plan (BAF-PH1-830-P16-0027)
- Baffinland - Caribou Encounter Decision Tree (Appendix B)

2.13 BIRD PROTECTION MEASURES

2.13.1 ENVIRONMENTAL CONCERN

Birds are generally widespread and often encountered in the Baffin region. Virtually all of these birds are migratory. The main concern with birds is that, the potential exists that some aspects of the project may disrupt nesting and migratory patterns. Birds are an important part of the food chain in the Arctic ecosystem and changes in their numbers and distribution will directly affect predators like raptors and foxes that rely on them as a readily available source of food. It is against the law to disturb or destroy an active migratory bird's nest (Migratory Bird Convention Act and regulations).

2.13.2 ENVIRONMENTAL PROTECTION MEASURES

The following measures will be implemented to minimize disturbance to birds and bird nests:

- Personnel are not permitted to hunt birds.
- Inspections of each work area for nests will be conducted prior to commencement of project activity.
- On-ground inspections will be conducted for bird nest and eggs of each area prior to equipment placement or project activity. Active nest sites will be identified through observation of high densities of birds, nests, or birds exhibiting territorial behaviour indicating a nearby nest. Active nests must not be destroyed or disturbed.
- The inspections will be conducted based on method described in Appendix C of the EPP - Mary River Active Migratory Bird Surveys Protocol.
- Select new equipment placement location, at least 500 m from identified active nest sites, or as otherwise identified in the Mary River Terrestrial Environment Mitigation and Monitoring Plan.
- Precaution will be taken to avoid disrupting nest sites, if these are discovered.
- Songbirds, shorebirds, loons and waterfowl — If nests of these birds are found then drills, pumps and waterlines should be placed at least 500 metres from these nest sites and precaution should be taken to avoid disrupting them.
- Shoreline and waterline routes will be inspected for breeding birds, nests, and post-hatch young, before waterlines for drills are placed. Project Personnel should remain more than 100 m from these nest sites at all times and time spent on the hose alignment should be minimized to reduce disturbances in areas between water source and project activities.
- Active raptor (falcons, hawks and owls) nests will be avoided by relocation of project activities, if possible. Where possible or practical, Project activities will be relocated at least 500 m from known active raptor nests during the breeding season, or the activity will be rescheduled to outside the breeding season (mid-April to mid-August). An individual nest protection plan will be

produced by an avian biologist to direct activities within 500 m, or other appropriate distance, of the nest if it is not possible to relocate or delay the project activities.

- Bird sightings, particularly raptors or large concentrations of birds, should be recorded in the Wildlife Log (Section 3.10) at camp and reported to project biologists.
- If Species at Risk or their nests and eggs are encountered during Project activities, the primary mitigation will be avoidance. Project personnel shall establish clear zones of avoidance on the basis of the species-specific nest setback distances outlined in the Terrestrial Environment Mitigation and Monitoring Plan.
- Guy-wire deterrents will be used on communication towers established for the Project. Consideration will be given to reducing lighting when possible in areas where it may serve as an attractant to birds or other wildlife.
- Inspections of each work area for nests will be conducted prior to commencement of Project activity during the nesting season. Any nests found (or indicated nests) will be protected with a buffer zone determined by the setback distances outlined in the Terrestrial Environment Mitigation and Monitoring Plan until the young have fledged. If it is determined that observance of these setbacks is not feasible, nest-specific guidelines and procedures shall be developed to ensure the nests and their young are protected.
- Drills, pumps and waterlines should be placed at least 500 m from active bird nests and every precaution should be taken to avoid disrupting the nests. All Project Personnel must avoid active nest sites. Time spent on the hose alignment should be minimized to reduce disturbances in areas between the water source and Project activities. Active nests must not be destroyed.
- No drilling activity should take place within 500 m of an active raptor nest site during the breeding season (approximately mid-May to August); unless an individual nest protection plan has been prepared by an avian biologist in conjunction with the Baffinland Environment Department. Report all active nest sites to the Environmental Department.
- Whenever practical and not causing a human safety issue, a stop work policy shall be implemented when wildlife in the area may be endangered (at risk of immediate injury or death) by work being conducted.

2.13.3 FORMS

- Baffinland EPP – Wildlife Log (Section 3.10)
- Baffinland – Active Migratory Bird Nest Search Form (Section 3.11)

2.13.4 RELATED DOCUMENTS

- Baffinland - Active Migratory Bird Surveys Protocol (Appendix C)

2.14 SOLID WASTE MANAGEMENT

2.14.1 ENVIRONMENTAL CONCERN

Solid wastes are non-liquid, non-soluble materials including domestic garbage, food wastes, construction debris, commercial refuse, non-combustible and non-hazardous materials. Solid waste materials at site will be re-used and recycled wherever possible and feasible. Where it is not possible or feasible, the two main methods of solid waste treatment and/or disposal for the Project lifecycle will be incineration and off-site disposal. Solid waste, if not properly disposed of, may cause health and safety concerns to Project Personnel, attract wildlife, and could impair the aesthetics of the Eqe Bay Exploration Area.

2.14.2 INCINERATION

Domestic wastes, including, that cannot feasibly be re-used or recycled, will be incinerated at the Eqe Bay Exploration Area camp. Combustible non-hazardous wastes (i.e., food scraps, oily rags, paper and small plastics, etc.) is incinerated to minimize the negative impacts of attraction vectors to wildlife. Incinerator ash generated is analyzed and placed in containment for off-site disposal. Waste oil and waste fuel may be burned when possible in the incinerator as a secondary source of fuel.

2.14.3 OPEN BURNING

Untreated, clean wood waste products including lumber, timber, and pallets as well as paper and cardboard packaging that cannot feasibly be re-used or recycled will be burned onsite at approved open-burn locations in the Eqe Bay Exploration Area camp. Any treated and/or painted waste wood products, including plywood or particle board, is not permitted for opening burning. Open burning shall strictly be operated in an open top sea container at an approved open-burning location.

2.14.4 ENVIRONMENTAL PROTECTION MEASURES

- Waste streams generated at Eqe Bay Exploration Area are brought for incineration or to approved open-burn locations, or backhauled offsite for proper disposal at a licenced waste. Inert wastes such as scrap metal, discarded machinery parts, kegs, concrete, building materials, wood, rubber, and bulky plastics will be backhauled offsite for proper disposal at a licenced waste .
- Food wastes, packaging and paper will be incinerated on site. Kitchen grease will be shipped south for disposal.
- Untreated, clean wood waste products including lumber, timber, and pallets as well as paper and cardboard packaging that cannot feasibly be re-used or recycled will be burned onsite at an approved open-burn location.
- All wildlife attracting waste (i.e., food scraps, human waste) will be stored in sealed animal proof containers and incinerated as soon as practicable.
- All waste backhauled offsite will be manifested using the Off-Site Waste Disposal Log (Section 3.12) for tracking purposes.

- Sewage sludge generated at the sewage treatment plants will be dewatered and incinerated onsite.
- Waste accumulated on site prior to disposal will be confined so that it does not pose health or environmental hazards.
- Time lapse between collection and disposal shall be minimized to the extent practical.
- All combustible waste and debris will be stored and covered until disposal.
- Additional training will be provided to the kitchen and accommodations staff on sorting camp domestic wastes.
- All Project Personnel are responsible for daily clean-up of the area in which their work activities are being conducted

2.14.5 FORMS

Baffinland EPP - Offsite Waste Disposal Log (Section 3.12)

2.14.6 RELATED DOCUMENTS

- Baffinland EPP – Hazardous Material and Hazardous Waste Management (Section 2.16)
- GN - Industrial Waste Discharges into Municipal Solid Waste and Sewage Treatment Facilities

2.15 WASTEWATER TREATMENT

2.15.1 ENVIRONMENTAL CONCERN

Wastewater, such as sewage, grey water, and oily (contaminated) water will be generated throughout the lifecycle of the Project.

The quantity of treated effluent discharged from the Eqe Bay Exploration Area camp Waste Water Treatment Plant (WWTP) will be monitored and recorded using inline flow monitors. To fulfill the requirements of Baffinland's Type B Water Licence, routine water quality sampling of treatment effluent is completed at the WWTP by an accredited laboratory to confirm that effluent quality meets applicable discharge criteria and is acceptable for release into the receiving environment.

Uncontrolled or untreated releases of wastewater to the environment may impact drinking water, aquatic resources, wildlife and human health and should be reported immediately to the Environment Department (see Section 2.33 - Spill Control Measures and Reporting).

2.15.2 ENVIRONMENTAL PROTECTION MEASURES

The following measures will be implemented to minimize the potential for accidental releases of wastewater on site:

- Operation of Project WWTP is conducted in accordance with Baffinland's Type B Licence.
- Raw wastewater and final effluent quality will be sampled and tested according to the requirements of Baffinland's Type B Water Licence.
- All issues and/or concerns with Project WWTP (i.e., improper operation, pipeline rupture, system breakdown, etc.), must be reported immediately to the Environment Department.
- In the event of an accidental release of wastewater into the environment (i.e., pipeline rupture, etc.), immediate action is required to ensure that the release is contained and prevented from reaching any water body. Refer to Baffinland's Emergency Response Plan (BAF-PH1-840-P16-0002) and Spill Contingency Plan (BAF-PH1-830-P16-0036) for additional guidance. All sewage spills must be reported immediately to the Environment Department. For more information on spill reporting, see Operational Environment Standard: Spill Control Measures and Reporting (Section 2.33).
- Quantity of sewage treated will be documented continuously using in-line flow or vacuum truck counts. Vacuum truck counts will be tracked using the Wastewater Log (Section 3.13).
- Quantity of sludge generated by the Projects WWTP will be recorded daily by the WWTP operators.
- Data will be reported as required by Baffinland's Water Type B Licence and other relevant approvals.

- The sludge generated by the Project WWTP is dewatered using a filter press and incinerated on site. Sludge will be stored in an animal proof secure area until picked up for disposal.
- Conserve water use to reduce the amount of wastewater generated.
- Treated wastewater will only be released into the receiving environment at approved locations. All wastewater discharges are monitored to ensure all discharged effluent meets the regulatory requirements outlined in Baffinland's Type B Water Licence.

2.15.3 FORMS

- Baffinland – Wastewater Log (Section 3.13)

2.15.4 RELATED DOCUMENTS

- Baffinland EPP – Spill Control Measures and Reporting (Section 2.33)
- NWB – Type B Water Licence (2BE-XXXXXX)
- Baffinland - Emergency Response Plan (BAF-PH1-840-P16-0002)
- Baffinland - Spill Contingency Plan (BAF-PH1-830-P16-0036)

2.16 HAZARDOUS MATERIAL AND HAZARDOUS WASTE MANAGEMENT

2.16.1 ENVIRONMENTAL CONCERN

Hazardous materials (other than fuels) used throughout the lifecycle of the Eqe Bay Exploration include; oils, greases, antifreeze, calcium chloride salt, ammonium nitrate, lead acid batteries, cleaners and other chemicals. Where the generation of the hazardous waste cannot be prevented, its management aims to prevent waste from resulting on a potential negative to the health and safety of Project Personnel and the environment.

2.16.2 ENVIRONMENTAL PROTECTION MEASURES

Effective implementation of the following controls is required to ensure that hazardous materials and hazardous wastes are properly managed in order to minimize the potential for accidental releases to the environment:

- Hazardous materials and hazardous waste will be stored within designated lined and contained areas or within shipping containers at the laydown area.
- Storage containers will be leak-proof and have content names and labels clearly visible.
- All drums shall be marked with the name Baffinland Iron Mines Corporation.
- Hazardous materials arriving by sealift will be temporarily stored in their original sea containers at laydown locations at the Eqe Bay Exploration Area camp until transported to their final destination.
- Lubricating oils and antifreeze will be dispensed from drums or cubes using either fitted taps or pumps and will employ drip trays.
- Regular visual inspection for leaks, drips or indications of loss will be conducted at all storage areas for evidence of accidental releases and verification that wastes are properly labelled and stored.
- Waste storage sites will be monitored and sampled in accordance with Baffinland's Water Licences.
- All chemical spills must reported immediately to the Environment Department. The Emergency Response Plan and Spill Contingency Plan may be implemented, depending on the nature of the spill.
- Cleaning materials (i.e., rags, gloves, etc.) will be properly wrapped in sealed plastic bags and will be directed to disposal by incineration.
- All hazardous waste shall be clearly labelled and will not be combined with other solid non-hazardous waste.
- Smoking within 10 m of any hazardous waste storage location is prohibited.

- Baffinland shall itemize and maintain a tracking manifest for all hazardous materials to be used on-site. Environmental personnel shall conduct periodic inspections and audits to confirm the tracking manifest is up to date and accurate. Baffinland Departments and Contractors are responsible for maintaining the current Material Safety Data Sheets (MSDS) on-site for all hazardous materials pertaining to their activities.
- All hazardous material spills shall be reported to the Environment Department immediately and documented by submitting the necessary documentation within 12 hours of the spill using the Baffinland Incident Investigation Form and the NT-NU Spill Report Form (Section 3.6). All biological hazardous wastes generated at the medical clinic and first aid stations will be packaged, labeled and transported offsite for disposal at an appropriate licenced facility.
- Transportation and packaging of hazardous waste offsite shall be coordinated and supervised by fully-trained and qualified Project personnel or an appropriately licenced Contractor.

2.16.3 FORMS

- Baffinland – NT-NU Spill Report Form (Section 3.6)
- Baffinland – Baffinland Incident Investigation Form (BAF-PH1-810-FOR-0005)

2.16.4 RELATED DOCUMENTS

- Baffinland – Eqe Bay Spill Contingency Plan (BAF-PH1-XXX-XXX-XXX)
- Baffinland - Emergency Response Plan (BAF-PH1-830-P16-0007)

2.17 ROAD CONSTRUCTION AND BORROW DEVELOPMENT

2.17.1 ENVIRONMENTAL CONCERN

Excavations disturb the ground surface and any vegetative cover that stabilizes the ground and reduces the potential for erosion. The excavation of sand and gravel from borrow areas, as well as the cut and fill technique that will occur during road construction throughout the lifecycle of the Eqe Bay Exploration exposes soil, making it vulnerable to erosion.

These activities result in changes to the thermal regime of the ground (active layer and permafrost), as a new active layer is created. Modification to the thermal regime may induce melting of any ground ice present, resulting in thaw settlement and depressions caused by these settlements leading to erosion and possibly ponding of water.

2.17.2 ENVIRONMENTAL PROTECTION MEASURES

The ground surface will re-establish thermal equilibrium and will be suitable for re-colonization by natural vegetation over time. The following measures will be implemented to enhance this re-establishment of thermal equilibrium and minimize the effects of erosion, sedimentation and water ponding:

- Cut and fill areas will be stabilized by constructing gentle slopes less prone to erosion.
- Cut and fill areas are expected to be relatively small in horizontal and vertical extent. The side slopes of the borrow pits will be between 1H: 1V to 2H: 1V, slightly gentler than the slopes in the natural condition to reduce erosion.
- At low lying areas where roadbed fill is in the order of 1 m and the permafrost can be expected to rise to a meaningful degree, swales or culverts will be installed as part of road maintenance to prevent the ponding of water.
- At closure, swales will be left in place, or alternatively, the road bed will be breached to allow drainage.
- Borrow activities will occur only at approved locations and will be concentrated to limit the area of disturbance. Borrow pits will be located 31 metres away from the High Water Mark of the nearest water body or stream.
- Thawed layer removal will be done sequentially.
- Areas of unexpected settlement will be filled to re-establish the natural contours and eliminate ponding of water.
- Regular inspection of borrow locations will be completed and unstable slopes re-graded to eliminate depressions and re-establish natural drainage patterns.

2.17.3 FORMS

None

2.17.4 RELATED DOCUMENTS

- Baffinland EPP - Sediment and Erosion Control (Section 2.9)

Baffinland EPP – Excavations and Foundations (Section 2.27)

2.18 EXPLORATION DRILLING OPERATIONS

Exploration drilling will be required to confirm, characterize and quantify new and already known deposits during the life of the Project.

2.18.1 ENVIRONMENTAL CONCERN

Environmental concerns with drilling include surface disturbances, drilling fluid and cutting disposal, impacts on dust, noise and water quality, and habitat encroachment.

All drilling muds and other additives must be approved by the Environment Department prior to being transported and used on site for any exploration drilling program. Data on drilling muds and other additives must be included as part of the Emergency Response and Spill Contingency Management Plans.

Use of water for drilling for the Project is subject to the conditions outlined in the Baffinland's Type B Water Licence (2BE-XXXXXX).

2.18.2 ENVIRONMENTAL PROTECTION MEASURES

- Pre-drilling Preparation and Acceptable Drill Locations
    - Prior to drill placement, investigate site drainage to determine the proper downstream placement of the collection/settling sump(s), if warranted. Note that in most situations, sumps will be required; however, in some circumstances sumps may not be practical. In these cases, approval must be obtained by the Environmental Department.
    - Ensure sumps are of sufficient capacity based on a combination of proposed drill hole length, water usage, and the potential residence time of the sumps.
    - Do not construct drill sites or drill sumps within 31 metres of the Normal High Water Mark of a water body unless specific approval is obtained by Baffinland from the Nunavut Water Board.
    - Ensure that the Pre-drilling Inspection Report (see Section 3.3) is completed prior to finalizing the drill site, sump locations, and silt fence locations.
    - Silt fences shall be placed immediately down-gradient of drill set-ups/sumps and up-gradient of any water body or stream. The selection of silt fence locations will be based on minimizing the transport distance of drill cuttings/mud and placing silt fences in optimal locations that will be functionally effective.
    - Archaeology clearance shall be obtained from the Environment Department for all exploration drill locations (Section 2.1 – Cultural Heritage and Archaeological Resources).
    - Conduct a wildlife inspection immediately prior to movement of the drill, involving aerial and ground survey of the new drill site. For details on drilling restrictions associated with wildlife interactions, see Operational Environment Standards: Polar Bear Encounters

(Section 2.10), Fox and Wolf Encounters (Section 2.11), Caribou Protection Measures (Section 2.12) and Bird Protection Measures (Section 2.13).

- Drill Operations and Movements
  - Material shall not be stored on the surface of frozen streams or lakes, including immediate banks, except materials that are for immediate use.
  - Ensure that the drilling area is kept clean and tidy at all times. No littering is permitted - collect and package all waste for disposal at camp.
  - Feeding of all wildlife is prohibited.
  - All activities shall be conducted to minimize surface disturbance.
  - Minimize overland transportation for transport of workers off of approved roads and trails to reduce the potential for ground disturbance.
  - Do not use surface vehicles to move drill rigs or other equipment, without prior authorization by the Environment Department. The use of any vehicles off approved routes is prohibited.
  - Do not move equipment or vehicles unless the ground surface is in a state capable of fully supporting the equipment or vehicles without rutting or gouging.
  - Daily checks of active sumps will be conducted to ensure that any sump water spill-over occurs in a controlled manner. Sumps are to be constructed so that there is an overflow notch cut into the sump embankment to allow the sump water to decant from the sump in a controlled fashion.
  - Silt fences will be placed downstream of the sumps as described previously and will be checked daily.
  - Daily inspections for fuel/hydraulic leaks, equipment condition, sediment and erosion control, and water intakes shall be conducted prior to commencing work activities at the start and end of each work shift/day. All leaks shall be immediately repaired.
  - A Daily Drill Inspection Report (Section 3.5) will be filled out by the acting Supervisor for every day of drill operation.
  - All drill rigs shall be equipped with spill kits in the event of leaks and spill. All operators should be trained in spill response and be familiar the use of spill kits.
  - If the bottom of the permafrost is broken through by the drill, the depth of the bottom of the permafrost and location shall be reported immediately to the Environment Department who followed by providing notification to the Nunavut Water Board.
  - Equipment or material shall not obstruct any stream.

- Equipment storage holding areas will be located on gravel, sand or other durable land 31 metres above the ordinary High Water Mark of any water body in order to minimize impacts on surface drainage and water quality.

- Water Use, Brine and Drill Water Runoff
  - Brine (calcium chloride salt mixed with water) used in exploration drilling is to be controlled to the maximum extent practicable. Drilling muds contained in drilling fluids must be settled out in sumps or by silt fences prior to entering any downstream water bodies or streams.
  - Salt and water use for each drill is to be controlled by the use of brine mixing stations. The brine station operator will inspect his/her station daily and will be in continuous communication with each exploration drill. Brine conservation measures will be adopted which will include: shutting off the flow of brine to drills when brine is not required (i.e., when drills are temporarily shut down); eliminating all spillage in the vicinity of the brine stations; and minimizing to the greatest extent practicable the brine's salt concentrations.
  - All water intake hoses shall be equipped with a screen of an appropriate mesh size (as approved by the DFO) to ensure that fish are not entrained. Additionally, operators will ensure the water intake hoses withdraw water at such a rate that fish do not become impinged on the screen.
  - Measures shall be provided to prevent and control erosion on banks of any body of water.
  - Streams cannot be used as a water source unless authorized and approved by the Nunavut Water Board.
  - If water is required from a source that may be drawn down (small lake or stream), Baffinland shall submit a request for approval to the Board at least 15 days prior to withdrawing the water.
  - Drill water shall be obtained from water sources(s) proximal to the drilling targets and shall not exceed a total of 250 m^3 per day for all drilling activities on the Project.
  - Water use will be tracked using inline water metres on intake lines and recorded on the Daily Drilling Inspection Reports (Section 3.5).
  - No material shall be removed from below the ordinary High Water Mark of any water body unless authorized.
  - Contain and re-circulate drill water to the fullest extent possible in order to reduce water usage. Utilize silt fences and natural depressions to divert water from running into nearby watercourses and water bodies.
  - Separate clean water from "dirty" water streams whenever possible, (by means of hose extensions and snow berms or other means that direct and keep discharge away from the

immediate area of the drillhole) to prevent migration and expansion of a "dirty" water plume.

- Work shall be performed in such a way as to ensure that materials such as sediment, fuel and/or any other hazardous material does not enter watercourses and waterbodies through the implementation of sediment control measures and proper hazardous materials management practices . In the event of a release to the environment, a spills contingency plan shall be implemented.
- The drill water supply temperature should be monitored during drilling and kept to a temperature as low as possible (but not so low as to cause an imminent risk of frozen water lines).
- To maximize drill return water recirculation, casing is to be frozen into the ground to a depth of 3 to 6 m below grade. The specific depth of casing to be frozen into each hole and length of time to allow for freezing will be specified by the acting Supervisor.
- The drill water and cuttings spillage footprint shall be minimized through the use of berms, silt fences and/or other means of containment.
- Dispose of drill water into a properly constructed sump, or a naturally occurring contained depression. Drill water shall not be released directly to a nearby water course or to the ground.
- Use portable containment sumps (bins), for drill water and cuttings where containment in the ground is impractical. The bins shall not overflow and shall be dumped by means of helicopter or pump, to the location identified for disposal of dirty drill water and cuttings.
- Drilling waste must not be allowed to spread to the surrounding land or water bodies; the footprint of any spillage must be minimized to the greatest degree practicable.
- In case of an artesian flow occurrence, drill holes shall be immediately plugged and permanently sealed to prevent induced contamination of groundwater or salinization of surface waters. Report the artesian flow occurrence within 48 hrs to the Environment Department who in turn will report the occurrence to the Nunavut Water Board.
- For on-ice drilling, returned water released must be nontoxic, and not result in an increase in Total Suspended Solids (TSS) in the immediate receiving water above the CCME guidelines for the protection of Fresh Water Aquatic Life (i.e. .10 mg/L for lakes with background levels under 100 mg/L or 10% for those above 100 mg/L).

- Drill Hole Abandonment
  - Materials such as debris and/or drill cuttings shall not be left on the ice when there is potential for that material to enter a waterbody.

- Restore, contour and stabilize al; constructed drill sumps, and other disturbed areas, to the pre-disturbed state immediately upon completion of drilling.
- Return all combustible waste and petroleum products to camp for proper management and disposal.
- Plug all drillholes upon completion, and where possible return drill cuttings at surface to the drillhole at all land-based drilling locations.
- Contour and stabilize all other disturbed areas upon completion of work and restore these areas to a pre-disturbed state.
- Upon completion of a hole in rock, the casing will be removed. If the casing cannot be removed it will be cut off to be flush with surface and backfilled.
- Remove all non-combustible garbage and debris from the land use area to an approved disposal site.
- Return all combustible waste and petroleum products to camp for proper management.
- Ensure that a Post-Drilling Inspection Report (see Section 3.5 – Drill Inspection Form - Pre-Drilling, Daily and Post Drillings) is filled out at the completion of each drill hole.
- Copies of all Pre-Drilling, Post-Drilling and Daily Drill Inspection Reports for all drill holes will be submitted to the Environment Department at the completion of each drilling program.

2.18.3 FORMS

- Baffinland EPP – Drill Inspection Forms: Pre-Drilling, Daily and Post Drilling (Section 3.5)

2.18.4 RELATED DOCUMENTS

- Baffinland EPP – Sediment and Erosion Control (Section 2.9)
- Baffinland EPP - Polar Bear Encounters (Section 2.10)
- Baffinland EPP - Fox and Wolf Encounters (Section 2.11)
- Baffinland EPP - Caribou Protection Measures (Section 2.12)
- Baffinland EPP - Bird Protection Measures (Section 2.13)
- Baffinland EPP – Exploration Drilling Operation (Section 2.18)
- NWB - Type B Water Licence (2BE-XXXXXXX)

2.19 WILDLIFE LOG INSTRUCTIONS

Baffinland is required to keep a log of all wildlife sightings in the Eqe Bay Exploration Area as a requirement of its land use permits. A system of tracked wildlife log sheets has been set up by the Environment Department to monitor wildlife sightings.

Wildlife logs will be posted at all of the Project's operating camps. The information from these sheets will be regularly collected. Completed log forms are to be returned to the Environment Department for tracking wildlife log data.

Wildlife species potentially in the Project Area include caribou, wolf, wolverine, fox, arctic hare, lemmings, polar bear, walrus, seals, whales, raptors, loons, ducks, geese, songbirds and shorebirds. All on-site Project Personnel are required to record wildlife sightings on the posted Wildlife Log (Section 3.7) with the exception of caribou sightings, which should be reported to the Environment Department directly due to sensitive nature of these sightings. Identify the animal to the best of your knowledge. If you do not know the species, record a general group name, such as 'duck' or 'small bird'. If you are unsure, indicate this, such as 'fox or wolf?' Record tracks only if they are fresh.

All polar bear and wolf sightings are required to be reported to the Environment Department immediately. Refer to OESs: Polar Bear Encounters (Section 2.10) and Fox and Wolf Encounters (Section 2.11) for additional information on polar bear and wolf sightings. Refer to Caribou Protection Measures (Section 2.12) for additional information on caribou sightings.

2.19.1 WILDLIFE LOG INSTRUCTIONS

- Record your name and the date of the observation.
- Briefly describe the location, noting any significant landmarks, road kilometre marks, water bodies or other features. This is particularly important if Site Personnel are not equipped with a GPS.
- Record the GPS coordinates if possible. Ensure coordinates are recorded in latitude/longitude or UTM NAD83.
- Record the type of animal. Identify the species, if possible, or the general type or group.
- Record the number of animals observed and the life stage (juvenile or adult), if known.
- Record observations on the behaviour of the animal. What was it doing at the time you observed it? Was it making any sound? How did it react to your presence? How far away was it? Were you walking/driving/flying?

2.19.2 FORMS

- Baffinland EPP – Wildlife Log (Section 3.10)

2.19.3 RELATED DOCUMENTS

- Baffinland EPP – Polar Bear Encounters (Section 2.10)
- Baffinland EPP – Fox and Wolf Encounters (Section 2.11)
- Baffinland EPP – Caribou Protection Measures (Section 2.12)
- Baffinland EPP – Bird Protection Measures (Section 2.13)

2.20 QUARRY AND BORROW PIT MANAGEMENT

A small number of rock quarries and borrow pits will be required throughout the Eqe Bay Exploration Area life cycle. The excavated aggregate and rock from borrow pits and quarries will be stockpiled until required for further processing or construction activities. During quarry development, overburden and soil will be removed and stockpiled to expose the bedrock.

2.20.1 ENVIRONMENTAL CONCERN

Quarrying and borrow pit operation may be responsible for a number of environmental impacts throughout the life of the Project. Potential impacts include: soil erosion, habitat loss, dust generation, permafrost degradation and water ponding. The water quality of waterbodies adjacent to these activities may also be impacted by means of sedimentation, fuel contamination and ammonia contamination from explosives residue.

2.20.2 ENVIRONMENTAL PROTECTION MEASURES

The following environmental protections measures for rock and aggregate excavation and management shall be implemented when developing all borrow pits and quarries:

- All Project Personnel involved in quarry and/or borrow pit development will be familiar with the conditions and environmental protection measures outlined in the Company's Borrow Pit and Quarry Management Plan as well as site specific Quarry Management Plans.
- The limits of the area to be excavated and the aggregate stockpile areas shall be clearly flagged/staked in the field prior to conducting any construction activities in the field.
- The borrow pits shall be designed to drain away from the face of the borrow pit to prevent water from ponding in borrow pits.
- A site specific Quarry Management Plan shall be developed for each of the Project's quarries.
- All quarry materials used shall be non-acid generating and non-metal leaching in chemical characteristics.
- When explosives are utilized Environmental personnel shall monitor the effects of explosives residue and related by-products from project-related blasting activities. In the event water licence criteria or other criteria established in the quarry or waste rock management plans are exceeded or close to being exceeded, Mine Operations personnel will work with Environment to develop and implement effective preventative and/or mitigation measures, including treatment, if necessary, to ensure that the effects associated with the manufacturing, storage, transportation and use of explosives do not negatively impact the Project and surrounding areas.
- Retain as much vegetation as practicable to the maintain slope stability.

- The side slopes of the borrow pits will be 1H:1V to 2H:1V, slightly gentler than natural slopes to reduce erosion.
- Maintain natural drainage patterns to the extent practicable.
- Maintain vegetation buffer zones to protect water bodies.
- Sources of in-pit water will be diverted away from the development area by constructing ditches and berms using rip-rap, geotextile and other sedimentation control measures. Ditching will be minimized to reduce land disturbance and will be approved by the Environment Department prior to construction.
- Organics and topsoil will be salvaged and stored for use in reclamation. Overburden material may be stored for reclamation or if the material is of acceptable quality, be used for construction.
- All material stockpiles, including aggregate, rock, waste rock and overburden, will be located at least 31 metres above the ordinary High Water Mark of any water body, unless for immediate use.
- Use rip-rap to reinforce drainage channel corners and water discharge points.
- Promote natural revegtation where required to stabilize slopes.
- Adequate sediment and erosion control measures, including silt fences, turbidity curtains, settling ponds and gravel berms, will be installed around the development area to protect adjacent watercourses and waterbodies from adverse impacts such as sedimentation and elevated turbidity levels (Section 2.9 – Sediment and Erosion Control).
- Use proper fuel containment and handling techniques, and have spill kits accessible.
- Use proper explosives handling techniques to minimize waste.
- Ice-rich material will be stockpiled 31 m above the ordinary High Water Mark of any water body and in a location where melt water will not re-enter the pit or have adverse impacts on adjacent aquatic resources.

2.20.3 FORMS

None

2.20.4 RELATED DOCUMENTS

- QIA Land Use Permit
- Baffinland EPP – Land Disturbance (Section 2.3)
- Baffinland EPP – Sediment and Erosion Control (Section 2.9)
- Baffinland EPP – Road Construction and Borrow Pit Development (Section 2.17)

2.21 COMPLIANCE INSPECTIONS

Personnel are responsible for maintaining a clean, safe and environmentally acceptable work area. Personnel are expected to conduct and document regular inspections of their work areas and facilities to ensure the Company's commitments and expectations regarding health, safety and environment are being met or exceeded. Inspection documentation shall be made available to Environment personnel conducting periodic inspections or to external inspectors, regulators, and agencies conducting inspections under the terms and conditions of Baffinland's licences, permits, authorizations, and leases.

In addition to departmental inspections, Environmental personnel will conduct routine inspections throughout the Project site to confirm department personnel are operating in accordance with the Company's Water Licences, permits and other regulatory requirements put in place by stakeholders, land owners and government regulators. Project Personnel who are unsure about certain environmental impacts and/or necessary protection measures should consult the Environmental Protection Plan first followed by the Environment Department before proceeding with the activity under question.

While conducting inspections, departments should pay close attention to the following:

- All hazardous materials and hazardous waste should be contained in a spill tray, a lined containment berm or some other form of secondary containment.
- All waste should be segregated in accordance with the Waste Sorting Guidelines. Departments should ensure that disposal bins for each type of waste (hazardous, landfill, incinerator) are accessible and clearly labelled.
- All food waste and wildlife attractants will be disposed indoors to prevent the attraction and food conditioning of wildlife.
- All refuelling and equipment maintenance activities should employ the use of spill trays to prevent hazardous materials such as fuel, oils and greases from spilling onto the ground. See the Environmental Standard – Use of Spill Trays at Site for more details.
- All spills should be documented and reported to the Environment Department as soon as possible. Spills should be cleaned up as soon as possible after being reported, unless told otherwise by the Environment Department. For more details on spill reporting see Operational Environment Standard: Spill Control Measures and Reporting (Section 2.22).
- For a complete list of project components and items to monitor refer to Environmental Inspection Forms (Section 3.12).
- The schedule for conducting environmental inspections will vary from month to month and will be established by the Environmental Superintendents and Coordinators and approved by the Environmental Manager. The schedule will be developed based on a Project activity risk based approach.

2.21.1 FORMS

- Baffinland EPP - Environmental Inspection Forms (Section 3.12)

2.21.2 RELATED DOCUMENTS

- Baffinland EPP – Spill Control Measures and Reporting (Section 2.22)
- Baffinland EPP – Fuel Storage and Handling (Section 2.7)
- Baffinland EPP – Hazardous Material and Hazardous Waste Management (Section 2.16)
- Baffinland – Environmental Standard - Waste Sorting Guidelines
- Baffinland - Environmental Standard – Use of Spill Trays at Site

2.22 SPILL CONTROL MEASURES AND REPORTING

A wide range of hazardous materials will be used during the life of the Project including Jet-A, diesel, oils, greases, antifreeze, calcium chloride salt, ammonium nitrate, lead acid batteries, cleaners and a variety of other materials. The management of hazardous materials onsite will focus on preventing the materials from causing harm to the health and safety of Project Personnel and the surrounding environment. All spills, leaks and releases of hazardous materials will be reported to the Environment Department immediately and documented by submitting the necessary documentation within 12 hours of the spill using the *Baffinland Incident Investigation Form* (BAF-PH1-810-FOR-0005) and *NT-NU Spill Report Form* (Section 3.5).

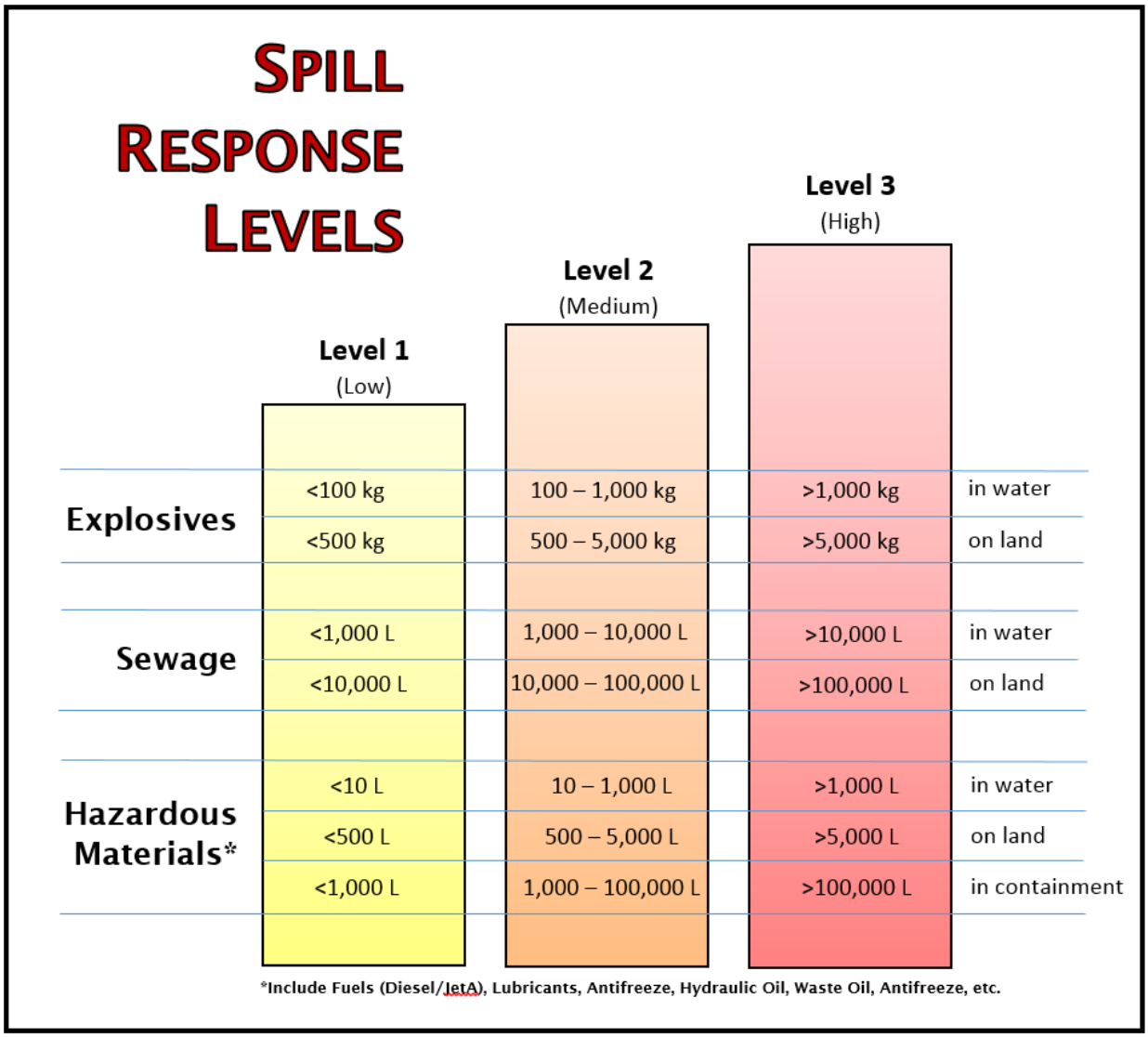
Refer to the Spill Contingency Plans and Emergency Response Plans for various response action levels based on type of hazardous product spilled, volume spilled and type of receiving environment. A brief summary of the various spill response action levels is provided below.

Emergency response action levels and response procedures for environmental (spill) emergencies are provided in Baffinland's Emergency Response Plan (ERP) (BAF-PH1-830-P16-0007) in addition to the Eqe Bay Spill Contingency Plan (BAF-PH1-XXX-XXX-XXX).

Baffinland has adopted a classification system that includes three levels of emergency response. Each level of emergency, based on the significance of the event, requires varying degrees of response, effort and support. With emphasis on spills and releases the three response levels are as follows:

- Level 1 (Low) – Minor accidental release of a deleterious substance with:
  - No threat to public safety; and/or
  - Negligible environmental impact to receiving environment.
- Level 2 (Medium) – Major accidental release of a deleterious substance with:
  - Some threat to public safety; and/or
  - Moderate environmental impact to receiving environment
- Level 3 (High) – Uncontrolled hazard which:
  - Jeopardizes project personnel safety: and/or
  - Significant environmental impacts to receiving environment

For spills, the level of emergency response to a spill incident is based on the substance released, quantity spilled, the receiving environment that is potentially impacted, and human health risk. The level of response is also based on whether the location of the spill release is within engineered containment. The following matrix provides a working guideline for project personnel.



Emergency spill response training shall be completed in conjunction with Baffinland's ERP. Baffinland's Emergency Response lead, with support from the Environmental Manager/Superintendents, will identify Project training needs and the resources required to provide the necessary skills to personnel tasked with duties in emergency and spill response. Circumstantially, emergency spill responses often occur in parallel with emergency responses (i.e. an overturned fuel tanker accident along the Tote road not only causes imminent hazards to site personnel, but also to the surrounding environment). To facilitate efficient emergency response to all different types of emergency scenarios, project personnel on the Mine Rescue Team (MRT) are trained to respond to Health and Safety emergencies and shall also receive sufficient training to effectively respond to accidental releases of hazardous materials.

Internal Baffinland reports are to be provided by the responsible department to the Environment Department via the Baffinland Incident Reporting System. All external reporting to outside agencies are to be provided by the Environment Department.

TABLE 2.22-1: GENERAL SPILL REPORTING AND CLEAN UP STANDARDS

Spill on Land		
Volume (L)	**Required Documentation**	**Spill Clean up**
Less than 1 litre	- Verbal or email report	Environment Department will advise if needed.
Greater than 1 litre and less than 100 litres	- Photos of Spill and Clean-up - Baffinland Incident Investigation Report - NT-NU Spill Report	Spills greater than 30 litres will have an Environmental Monitor present to advise clean-up efforts.
Greater than 100 litres	- Photos of Spill and Clean-up - Baffinland Incident Investigation Report - NT-NU Spill Report - Notification to regulators and the Spill Line	Environmental Superintendent or his/her designate will lead and advise clean-up efforts.
Spill on Water Body or Watercourse		
Volume (L)	**Required Documentation**	**Spill Clean up**
Any volume	- Photos of Spill and Clean-up - Baffinland Incident Investigation Report - NT-NU Spill Report - Notification to regulators and the Spill Line	Environmental Superintendent or his/her designate will lead and advise clean-up efforts.

2.22.1 FORMS

- Baffinland – Baffinland Incident Investigation Form (BAF-PH1-810-FOR-0005)
- Baffinland EPP - NT-NU Spill Report Form (Section 3.5)

2.22.2 RELATED DOCUMENTS

- Baffinland EPP – Hazardous Material & Hazardous Waste Management (Section 2.16)
- Baffinland – Eqe Bay Spill Contingency Plan (BAF-PH1-XXX-XXX-XXX)
- Baffinland - Emergency Response Plan (BAF-PH1-830-P16-0007)

3 DOCUMENTATION LOGS AND FORMS

DOCUMENTATION PROCEDURES

A key aspect of the EPP is effective record-keeping. The following logs and forms are to be used to record key information:

- Cultural Heritage Chance Find Discovery Form (Section 3.1).
- Human Use Log (Section 3.2)
- Water Collection Log (Section 3.3)
- Drill Inspection Forms (Section 3.4)
- NT-NU Spill Report Form (Section 3.5)
- Polar Bear Readiness Audit Form (Section 3.6)
- Wildlife Log (Section 3.7)
- Active Migratory Bird Nest Search Form (Section 3.8)
- Off-site Waste Disposal Log (Section 3.9)
- Wastewater Log (Section 3.10)
- Turbidity Monitoring Data Form (Section 3.11)
- Environmental Inspection Forms (Section 3.12)

The record keeping forms are described further in their respective sections of the EPP. All completed logs and forms are to be submitted to the appropriate departments.

3.1 CULTURAL HERITAGE AND CHANCE FIND DISCOVERY FORM

Cultural Heritage Chance Find Discovery Form

Reference No. (Environment Department to assign)

Please complete this form in the event of a chance find of a suspected burial, archaeological finds scatter, or an isolated find of a single artifact (e.g. stone tools/arrowheads, eggshell, pottery, concave milling/grinding stones, spherical hammerstones)

Date of discovery		**Time**
Name of discoverer/team		**Tel no.** **Email**
Location of the discovery	Project area : GPS coordinates :	
Description of archaeological discovery		
Estimated weight		Kg
Dimensions	x x	cm
Sketch of discovery area	**Drawing of chance find(s)**	
Temporary protection implemented		

Name	**Signature**	**Date**
Received by Environmental Manager	**Signature**	**Date**

Notes :

If you need more room to draw or describe the discovery area/finds, please use back of the page.
Please return this form to the Environment Department as soon as possible (within 24 hours of discovery at the most).

3.2 HUMAN USE LOG

Land and resource uses in the Project Area include; hunting, fishing, trapping, and tourism. Potential impacts to existing land use will include the interruption of camping, hunting, tourism and marine activities. Baffinland has made a commitment to minimize disturbance to other land users to the extent possible.

Approvals issued to Baffinland require that the Company monitor the potential effects of its activities on Inuit harvesting activities. To do so, Baffinland wants to be aware of when people come into the area. The objective is to understand the activities of other land users only as much as needed to be able to modify Project activities to minimize disruption to other land users. Baffinland does not want to know other people's personal business!

TABLE 3.2.1: HUMAN USE OF OBSERVATION LOG

Date	Where (GPS)	Number of People In Party	Inuit or Non-Inuit	Activities Observed (Camp, Hunting, Travel, Etc)

3.3 WATER COLLECTION LOG

Baffinland **Water Collection Log**

Date	Time	Truck ID	No. Loads	Source	Discharge Location	Operator name	Initials

3.4 DRILL INSPECTION FORMS

PRE-DRILLING INSPECTION REPORT

Baffinland	**PRE-DRILLING INSPECTION REPORT**		
	Baffinland personnel:		
	Date:		
	Time:		
	Proposed hole ID:		
	Final hole ID:		
PROPOSED HOLE INFORMATION:			
Deposit #:		**Collar location:**	E
Project:		(NAD 83)	N
Area:		**Dip:**	
NTS:		**Azimuth:**	
Elevation:		**Target depth:**	
Description of drill hole location:			
Purpose of drill hole:			
DRILLING INFORMATION:			
Has site been approved by drill foreman?			
Drill contractor: Drill personnel: Drill #:			
Expected start of drilling:			
Is moving of drill hole required?			
If yes, provide reason:			
New collar location:	E	N	
WATER MANAGEMENT:			
Water source:			
Pump Station #:			
Sump location identified and constructed?:	Yes/No (Photo required)		
Corner 1:	E	N	
Corner 2:	E	N	
Silt fence(s) constructed?: Yes/No (Photo required)			
Corner 1:	E	N	
Corner 2:	E	N	
SITE ASSESSMENTS:			
Are wildlife present?: (If yes, record in log)			
Is site safe for drilling?			
Stable platform	Yes /No	Fire Extinguisher	Yes /No
First Aid kit	Yes /No	Eye Wash	Yes /No
PPE	Yes /No	Spill Kits	Yes /No
Safety concerns/issues:			
Environmental concerns?			
PHOTOGRAPHIC RECORD:			
Photo of drill hole location prior to setup?		Yes /No	
Name:		Folder:	
Uploaded to hard drive?			
COMMENTS:			

DAILY DRILLING INSPECTION REPORT

Baffinland	**DAILY DRILL INSPECTION REPORT** **Baffinland personnel:** **Date:** **Time:** **Hole ID:**

HOLE INFORMATION:

Deposit #:	1	**Collar location:**	E
Location:		(NAD 83)	N

DRILLING INFORMATION

Drill contractor:
Drill personnel:
Drill #:

DRILLING PROGRESS:

Day Shift	**Night Shift**
Start depth:	**Start depth:**
End depth:	**End depth:**
Total depth drilled:	**Total depth drilled:**
Casing installed:	**Casing installed:**

Any rods/casing/tools lost in the drillhole? If yes, what was lost?

Delays/Problems: (breakdowns, stuck rods, bit change, weather, wait time, drill move, etc) Provide time estimate

WATER USE ASSESSMENT:

Sediment control measures in place:
Assessment of effectiveness:
Approximate water level in sump:
Color of water in sump:
Color of runoff?
Conductivity readings?: Station # Reading; Station # Reading; Station # Reading
Turbidity sample(s) taken?: Sample # Reading; Sample # Reading

DAILY WATER USE MONITORING:

Water meter reading (start of day):

Water meter reading (end of day):

SITE ASSESSMENT:

Are wildlife present?: (check log for previous wildlife activity)

Is site safe for drilling?

Stable platform	Yes /No	Fire Extinguisher	Yes / No
First Aid kit	Yes /No	Eye Wash	Yes / No
PPE	Yes /No	Spill Kits	Yes / No
Lined Berms	Yes /No		

Safety concerns/issues:
Environmental concerns?
Corrective action required?: Action plan (if required):
Responsible party:
Date to be completed: Photograph (only required to document problems and corrective actions)

PHOTOGRAPHIC RECORD:

Photo of drill hole during drilling? Photo of water management measures? Yes /No
Name: Folder:
Uploaded to hard drive?

COMMENTS:

POST-DRILLING INSPECTION REPORT

Baffinland	POST-DRILLING INSPECTION REPORT Baffinland personnel: Date: Time: Final hole ID:

HOLE INFORMATION:

Deposit #:
Project: MARY RIVER
Area: BAFFIN ISLAND
NTS: 37G/5
Elevation:
Description of drill hole location:
Purpose of drill hole:

Collar location: E
(NAD 83) N
Dip:
Azimuth:
EOH:

DRILLING INFORMATION:

Drill contractor:
Drill personnel:
Drill #:
End of drilling:
Casing:
Any rods/casing/tools lost in the drill hole? If yes, what was lost?

Are rods/casing left in the ground cut at ground level and is the hole properly plugged and capped? Yes / No
Next set-up collar location: E N

WATER USE ASSESSMENT:

Water source: Mary River
Pump station #:
Total amount of hours water was pumped from pump station:

SITE ASSESSMENT:

All materials and debris removed from site? Yes /No
Any environmental concerns? Yes /No If yes, please describe below:

Any additional work required? Yes /No If yes, please describe below:

Corrective action:
Responsible party:
Date to be completed by:

PHOTOGRAPHIC RECORD:

Photo of drill hole location following demobilization and clean up? Yes /No
Name: Folder:
Uploaded to hard drive?

COMMENTS:

INSPECTION COMPLETED BY:

Baffinland signature: Drill contractor signature:

3.5 NT-NU SPILL REPORT FORM

SECTION	OPERATIONAL ENVIRONMENT STANDARD	REVISION	REVISION DATE
3.6	NT-NU Spill Report Form	A	July 15, 2014

Northwest Territories Nunavut Canada

NT-NU SPILL REPORT

OIL, GASOLINE, CHEMICALS AND OTHER HAZARDOUS MATERIALS

NT-NU 24-HOUR SPILL REPORT LINE
TEL: (867) 920-8130
FAX: (867) 873-6924
EMAIL: spills@gov.nt.ca

REPORT LINE USE ONLY

A	REPORT DATE: MONTH – DAY – YEAR	REPORT TIME	☐ ORIGINAL SPILL REPORT, OR	REPORT NUMBER
B	OCCURRENCE DATE: MONTH – DAY – YEAR	OCCURRENCE TIME	☐ UPDATE # TO THE ORIGINAL SPILL REPORT	
C	LAND USE PERMIT NUMBER (IF APPLICABLE) IOL - Commercial Lease No.: Q13C301	WATER LICENCE NUMBER (IF APPLICABLE) 2AM-MRY1325 Type "A"		
D	GEOGRAPHIC PLACE NAME OR DISTANCE AND DIRECTION FROM NAMED LOCATION	REGION ☐ NWT X NUNAVUT ☐ ADJACENT JURISDICTION OR OCEAN		
E	LATITUDE DEGREES MINUTES SECONDS	LONGITUDE DEGREES MINUTES SECONDS		
F	RESPONSIBLE PARTY OR VESSEL NAME	RESPONSIBLE PARTY ADDRESS OR OFFICE LOCATION		
G	ANY CONTRACTOR INVOLVED	CONTRACTOR ADDRESS OR OFFICE LOCATION		
H	PRODUCT SPILLED	QUANTITY IN LITRES, KILOGRAMS OR CUBIC METRES	U.N. NUMBER	
	SECOND PRODUCT SPILLED (IF APPLICABLE)	QUANTITY IN LITRES, KILOGRAMS OR CUBIC METRES	U.N. NUMBER	
I	SPILL SOURCE	SPILL CAUSE	AREA OF CONTAMINATION IN SQUARE METRES	
J	FACTORS AFFECTING SPILL OR RECOVERY	DESCRIBE ANY ASSISTANCE REQUIRED	HAZARDS TO PERSONS, PROPERTY OR ENVIRONMENT	
K	ADDITIONAL INFORMATION, COMMENTS, ACTIONS PROPOSED OR TAKEN TO CONTAIN, RECOVER OR DISPOSE OF SPILLED PRODUCT AND CONTAMINATED MATERIALS			
L	REPORTED TO SPILL LINE BY	POSITION	EMPLOYER	LOCATION CALLING FROM / TELEPHONE
M	ANY ALTERNATE CONTACT	POSITION	EMPLOYER	ALTERNATE CONTACT LOCATION / ALTERNATE TELEPHONE

REPORT LINE USE ONLY

N	RECEIVED AT SPILL LINE BY	POSITION STATION OPERATOR	EMPLOYER	LOCATION CALLED YELLOWKNIFE, NT	REPORT LINE NUMBER (867) 920-8130

LEAD AGENCY ☐ EC ☐ CCG ☐ GNWT ☐ GN ☐ LA ☐ NAC ☐ NEB ☐ TC | SIGNIFICANCE ☐ MINOR ☐ MAJOR ☐ UNKNOWN | FILE STATUS ☐ OPEN ☐ CLOSED

AGENCY	CONTACT NAME	CONTACT TIME	REMARKS
LEAD AGENCY			
FIRST SUPPORT AGENCY			
SECOND SUPPORT AGENCY			
THIRD SUPPORT AGENCY			

PAGE 1 OF _____

3.6 POLAR BEAR READINESS AUDIT FORM

Baffinland

Polar Bear Audit

Auditors: _____ Date: _____

Dressing Hardware

- ☐ Two 6 inch Buck Knives
- ☐ Two 4 inch Buck Knives
- ☐ One Sawblade

Fire Arm Approved MRT Members on site

Name	Shift	Room

Preapproved Polar Bear Dressers

Name	Shift	Room

Carcass Sorage Location

Storage location	Temperature

Carcass Delivery Capabilities

Delivery Method	Delivery Timeline

3.7 WILDLIFE LOG

DID YOU SEE ANY WILDLIFE?

LET US KNOW ᐅᒪᔪᓐᓂᒃ

ᑕᑯᓚᐅᕐᐱᑦ ? ᐊᕐᑎ ᖃᐅᔨᑲᕐᑎᒍᑦ

Wildlife observations by site personnel make very important contributions to environmental baseline studies. It is important enough that Baffinland asks you to record any observations of wildlife by listing them on this form.
ᐅᒪᔪᓐᓂᒃ ᖃᐅᔨᓴᖅᑕᕐᓂᖅ ᓴᕕᒃᓴᕐᓂᐊᕐᕕᖕᒥ ᓴᓇᔪᓐᓂᑦ ᐊᑐᕈᑎᖃᑎᐊᕐᒪᑦ ᐊᕙᑎᒻᒥᒃ ᖃᐅᔨᓴᕐᓂᕐᒥᒃ.
ᐊᑐᕈᑎᖃᕐᓂᖓ ᐱᔪᑎᒋᓗᒍ ᐸᕙᓐᓚᑯᑦ ᐃᓕᓯᓐᓂᒃ ᐊᐱᕆᓲᑦ ᐅᒪᔪᓐᓂᒃ ᑕᑯᒐᖕᒐᕕᑦ ᑎᑎᖅᑕᕐᓗᒋᑦ

DATE ᐅᓪᓗᖓ	ANIMAL & HOW MANY? ᐅᒪᔪᖅ ᑭᓯᓚᐅᕐᐸ ᐊᒪᓗ ᖃᓯᐅᓚᐅᕐᐸᑦ ?	WHERE? ᓇᖕᓂ ?	COMMENTS ᐅᖃᐅᓯᑦ

Please leave wildlife alone. Do not feed them and never leave waste behind.

ᐊᕐᑎ ᐅᒪᔪᑦ ᐅᓚᕕᓴᖅᑕᖅᑭᓗᒋᑦ. ᕿᒥᕆᕙᖅᑭᓗᒋᑦ ᐊᒪᓗ ᑕᒪᐅᖕᒐᑐᐃᓇᖅ
ᐃᒋᑎᖅᑕᖅᑭᓗᑎᑦ

The information contained herein is proprietary Baffinland Iron Mines Corporation and is used solely for the purpose for which it is supplied.
It shall not be disclosed in whole or in part, to any other party, without the express permission in writing by Baffinland Iron Mines Corporation.

Note: This is an UNCONTROLLED COPY. All staff members are responsible to ensure the latest revision is used.

3.8 ACTIVE MIGRATORY BIRD NEST SEARCH FORM

Active Migratory Bird Nest Search Form

Survey Date: MM/DD/YYYY	Start Time: 24 hour	End Time: 24 hour

Names of Surveyors:	Total # of Surveyors:

Weather Conditions (Precipitation, Cloud cover, Wind, Temperature) – Note: Surveys should not be conducted in rain, snow or other inclement weather

Description of Search Area (Location – Geographic Place Name or Distance & Direction from Named Location, Size etc.):	Photos of Site:

Survey Map (Include any existing disturbance, water bodies or other geographic features and the location of any nests found)	Waypoint Corners of Search Area (Waypoint #, Latitude, Longitude)
	Waypoint Corner 1:
	Waypoint Corner 2:
	Waypoint Corner 3:
	Waypoint Corner 4:

Number of Nests Found (Details on Page Two)

Nest Observations:

Nest ID #	Waypoint (Waypoint #, Latitude, Longitude)	Species/Species Group	# Eggs/Young
	Description of Nest		Photo Numbers
	Nest Buffer Applied (Size, How it was Determined, How it was Marked)		

Nest ID #	Waypoint (Waypoint #, Latitude, Longitude)	Species/Species Group	# Eggs/Young
	Description of Nest		Photo Numbers
	Nest Buffer Applied (Size, How it was Determined, How it was Marked)		
Nest ID #	Waypoint (Waypoint #, Latitude, Longitude)	Species/Species Group	# Eggs/Young
	Description of Nest		Photo Numbers
	Nest Buffer Applied (Size, How it was Determined, How it was Marked)		
Nest ID #	Waypoint (Waypoint #, Latitude, Longitude)	Species/Species Group	# Eggs/Young
	Description of Nest		Photo Numbers
	Nest Buffer Applied (Size, How it was Determined, How it was Marked)		

3.9 OFF-SITE WASTE DISPOSAL LOG

Line	Prov. Code	Shipping Name of Waste (i.e. Kitchen Grease, Contaminated Oily Solid, etc.)	Class	UN	P.G	Quant. Shipped (kg)	Packaging				Phys. State (S, L, G)
							Mine Site	Milne Port	Total	Packaging Type	

Note : PACKAGING TYPE : 01 drum; 02 tank; 03 bulk; 04 carton; 05 bag; 06 roll-off or lugger; 07 other

3.10 WASTEWATER LOG

Baffinland **Wastewater Log**

Date	Time	Truck ID	No. Loads	Source	Discharge Location	Operator name	Initials

3.11 TURBIDITY MONITORING DATA FORM

CROSSING ID:			
Field Crew:		**Date:**	**Time:**
LOCATION **Datum:**		**Zone:**	
Easting (m):	**Northing (m):**	**Elevation (from mapping):**	**Other notes:**
CURRENT WEATHER: Wind:	**Air Temp:**	**Precipitation:**	**Cloud Cover (%):**
Recent Weather Events:			
CONSTRUCTION **Construction Phase (circle one):** Pre-Construction During Construction Post-Construction			
Type of Activity:	**Equipment in Use:**		
Date Construction Began:			
Is the crossing location changing? (i.e. Is the crossing moving upstream or downstream of its original location? How far? Which direction?)			
SITE SKETCH, NOTES, REMARKS: (i.e. high water table, high turbidity, natural bank erosion, water color, char observed in stream, algae in water, etc.) Is there anything unique about this crossing compared to other watercourses? (i.e. steep banks, clay in water, etc.)			
Substrate Particles **% Areal Coverage (est.)** **% sand/silt/clay (<2mm)** **% gravel (2 - 64 mm)** **% cobble (64 - 256 mm)** **% boulder (> 256 mm)** **% bedrock**		**Riparian Vegation and Shading (describe):**	

***IN SITU* TURBIDITY READINGS** (complete at least one measurement upstream and downstream of crossing)
Meter Make and Model:

Location	Distance from crossing (m)	Turbidity (NTU)	Time	Location	Distance from crossing (m)	Turbidity (NTU)	Time
Upstrea				Upstream			
Crossing				Crossing			
Dwnstrm				Downstrea			

FLOW ESTIMATES **Location :**	
High Water Width (m):	**Distance between points (m):**
Wetted Channel Width:	**Time (min): /**
Approx. Average Depth:	**Surface velocity estimate:**
	Average Velocity (0.8 (1) x Surface Velocity) (V) =
Note (1) - depends on substrate composition: 0.8 for rough, loose rocks or coarse gravel / 0.9 for smooth mud, sand, or hard pan rock	
PHOTOS: (upstream, crossing, downstream)	
NOTES:	

3.12 ENVIRONMENTAL INSPECTION FORMS

Aircraft Fuel Dispensing Areas Inspection Checklist

Date:	
Inspecting Personnel:	
Camp:	

	Condition	Y/N or NA	Recommended Corrective Action (if necessary)	Responsible Party	Corrective Action Taken or Plan	Completion Date
1	Is a spill kit present and fully stocked?					
2	Is a drum or disposal bin present for used absorbent pads?					
3	Is there a spill tray present for re-fuelling activities?					
4	Are spill trays damaged or overflowing?					
6	Are fuel lines damaged or leaking?					
7	Does the Jet A fuel tank have visible signs of overflow (ex. stains on the side of the tank)?					
8	Are there visible leaks or free product within the fuel berm?					
9	Is there evidence of leaking or visible staining outside of lined area?					
10	Is there water present in the bermed area? If so, specify maximum water depth.					
11	Is there free phase product visible on any water surface within the bermed area?					
12	Are there signs of instability or tears in bermed areas? (i.e. collapsing berm or exposed liner).					
13	Is there any other refuse present? (i.e. garbage, loose materials, etc.)					

Additional Notes:

Containment Berms and Accommodations Complex Fuel Storage Inspection Checklist

Date:	
Inspecting Personnel:	
Camp:	

Baffinland

Area		Condition	Y/N or NA	Recommended Corrective Action (if necessary)	Responsible Party	Corrective Action Taken or Plan	Completion Date
Accomodations Complex - Fuel Tanks (Day)	1	Are spill kits present, labelled and fully stocked?					
	2	Is there any visible damage to the fuel tanks?					
	3	Are any lines, fittings, or pipes damaged and/or leaking?					
	4	Are there any fuel stains or visible spills near the fuel storage tanks?					
	5	Are storage tanks protected by cement barriers?					
Containment Berms (Bladder Farm, New Product Berms, Steel Tank Farm)	1	Is a spill kit present, labelled and stocked at each berm?					
	2	Are there visible leaks or stains within or outside the berms?					
	3	Is there water present in the bermed areas? If so, specify maximum water depth.					
	4	Is there free phase product visible on any water surface within the bermed areas?					
	6	Are there signs of instability or tears in bermed areas? (i.e. collapsing berm or exposed liner)					
	7	Are all containers within the berms labelled, stored upright, and in good condition (i.e. free of structural defects)?					
	8	Is there any refuse present? (i.e. garbage, loose materials, etc.)					

Additional Notes:

Hazardous Waste Containment Berm Inspection Checklist

Date:

Inspecting Personnel:

Camp:

Baffinland

	Condition	Y/N or NA	Recommended Corrective Action (if necessary)	Responsible Party	Corrective Action Taken or Plan	Completion Date
1	Are spill kits present, labelled, and fully stocked?					
2	Are all containers within the berm correctly labelled, stored upright and in good condition (i.e. free of structural defects)?					
3	Is there evidence of leaking or visible staining outside of lined area?					
4	Is there water present in the bermed area? If so, specify maximum water depth.					
5	Is there free phase product visible on any water surface within the bermed area?					
6	Is there free phase product visible on the ground within the bermed area?					
7	Are there signs of instability or tears in bermed areas? (i.e. collapsing berm or exposed liner)					
8	Is there any other refuse present? (i.e. garbage, loose materials, etc.)					

Additional Notes:

Crusher and Quarry Inspection Checklist

Date:	
Inspecting Personnel:	
Camp:	

Baffinland

	Condition	Y/N or NA	Recommended Corrective Action (if necessary)	Responsible Party	Corrective Action Taken or Plan	Completion Date
1	Are hazardous materials and waste being stored in secondary containment?					
2	Are spill kits present, labelled, and fully stocked?					
3	Is explosives packaging (boxes, plastic bags) being burnt in an approved open burn location?					
4	Is ash generated from open burns being transferred and stored in the appropriate drums?					
5	Are waste items being properly sorted and diposed of?					
6	Are the natural drainage patterns of the quarried area still intact?					
7	Are silt fences or settling ponds in place to limit sediment transport into surrounding water bodies?					
8	Is there any signs of pooling water or thawing permafrost?					
9	Are there any fuel stains or visible spills?					
10	Is topsoil or overburden being stockpiled in area away from drainage routes?					
11	Are operators conducting pre-operation checks on their equipment?					
12	Do equipment operators have an adequate amount of spill reponse supplies on board?					

Genset Area Inspection Checklist

Date:	
Inspecting Personnel:	
Camp:	

Baffinland

Area		Condition	Y/N or NA	Recommended Corrective Action (if necessary)	Responsible Party	Corrective Action Taken or Plan	Completion Date
Genset Area	1	Is a spill kit present, labelled and fully stocked?					
	2	Are spill berms present under the oil drains, hose connections, and any other points of potential leakage?					
	3	Are spill berms in danger of overflowing?					
	4	Is there visible staining under the oil drains or other areas of potential leakage?					
	5	Are any hoses or nozzles cracked, damaged or leaking?					
	6	Are all hazardous waste/materials in secondary containment?					
	7	Is there any other refuse present? (i.e. garbage, loose materials, etc.)					

Additional Notes:

Incinerator and Burnable Waste Storage Inspection Checklist

Date:

Inspecting Personnel:

Camp:

Baffinland

	Condition	Y/N or NA	Recommended Corrective Action (if necessary)	Responsible Party	Corrective Action Taken or Plan	Completion Date
1	Is a spill kit present, labelled and fully stocked?					
2	Are fuel lines damaged or leaking?					
3	Are spill trays present at any points of potential leakage in fuel lines? (e.g. hose connections)					
4	Is any burnable waste securely contained within the sea can?					
5	Are any inappropriate waste types present (ex. styrofoam, aerosols, waste batteries)?					
6	Is the surrounding area free of loose debris?					
8	Are there any animal attractants (ex. food waste being left outdoors)?					
9	Is the door to the incinerator securely shut to prevent animal access?					
11	Do all ash drums have lids on them?					
12	Are operators filling out the incinerator log?					
13	Is there signage describing acceptable wastes?					

Additional Notes:

Tent City (Exploration Camp) Inspection Checklist

Date:	
Inspecting Personnel:	
Camp:	

Baffinland

	Condition	Y/N or NA	Recommended Corrective Action (if necessary)	Responsible Party	Corrective Action Taken or Plan	Completion Date
1	Are fuel berms present behind each tent?					
2	Are fuel berms structurally sound? (i.e. no rips, tears or leaks)					
3	Are fuel berms in danger of overflowing?					
4	Are fuel drum and fuel drum stands structurally sound? (i.e. punctures, tilting, etc.)					
5	Is there any staining around fuel berms or tents indicating a spill?					
6	Are the fuel lines damaged or leaking?					
7	Is there any refuse present? (i.e. Loose garbage)					
8	Is environmental lab waste stored in a labelled quatrex bag?					

Additional Notes:

Baffinland

Waste Sorting Area Inspection Checklist

Date: _____
Time: _____
Inspector name: _____
Inspector's position: _____

Please review and complete the form as applicable. Any non-conformances with the waste sorting area should be reported to the Environment Department.

General Site			
	Yes	No	Corrective Action
Is the route to the waste sorting area in suitable condition to provide truck access?			
Are the waste sorting signs in good condition?			
Are the waste containers upright and in their appropriate locations?			
Does the waste appear to be sorted?			
Is the site clean and free of litter?			
Are there any unacceptable wastes present? (ie. food scraps, cardboard, paper, scrap wood, small plastics or other burnables)			

Waste Sorting Containers						
	Container type* (drum or quatrex)	Quantity	Capacity (Full, half, empty)	Condition (OK, damaged, leaky)	Signage (OK, damaged, missing)	Comments
Aerosol cans						
Used absorbents						
Propane Containers						
Used oil filters						
Waste batteries						
Contaminated hoses						
Mixed waste containers						
Oily plastics						

Additional Comments

_____

_____

Baffinland

General Environmental Inspection Form

NAME:_____ DATE:_____

AREA(S) INSPECTED:_____

_____

_____

_____

ENVIRONMENTAL CONCERNS: _____

_____

_____

CORRECTIVE ACTIONS REQUIRED:_____

_____

_____

_____

COMMENTS:_____

_____

_____

4 REQUEST FOR REVISION TO AN OPERATIONAL ENVIRONMENT STANDARD

The Environmental Protection Plan is a living document, and its users are encouraged to suggest changes to the content or wording of Operational Environment Standards to make the document more useful, appropriate to the work being conducted, and user-friendly.

Please submit a copy of this Request for Revision to an Operational Environment Standard to the Baffinland Environmental Superintendent.

Section To Be Revised (or Title of New Operational Environment Standard): (E.g. Section 2.1 Archaeology)
Nature of Proposed Change: (E.g. update, addition, new, etc.)
Rationale For Request (E.g. Environmental Protection, worker safety, etc.)
The Revision (or New Operational Environment Standard): (Text)

Appendix A -
Polar Bear Readiness Procedure and Audit

POLAR BEAR READINESS PROCEDURE AND AUDIT

Introduction

The purpose of this document is to ensure that all Polar Bear incidents are documented and promptly reported to regulators and that all preparation and requirements regarding Polar Bear mortalities are in place. The Polar Bear Safety Plan should be referenced for additional information pertaining to Polar Bear Mortalities.

Reporting Requirements

In the event of a Polar Bear mortality QIA, HTO and the GN Wildlife Officer must be notified within 2 hours of the kill.

QIA
Mr. David Qamaniq, Acting QIA Environmental Monitor, (867) 899-8640, dqamaniq@qia.ca
Mr. Stephen Bathory, Acting QIA Environmental Monitor, (867) 975-8400, swbathory@qia.ca.

HTO
Mrs. Rebecca Mikki, HTO Manager (Igloolik), (867) 934-8807, igloolikhto@gmail.com
Mr. David Arreak, HTO Manager (Pond Inlet), (867) 899-8856, htopond@qiniq.com

Government of Nunavut Wildlife Officer
Mr. George Koonoo, Wildlife Officer, (867) 899-1330, pondwildlife@qiniq.com

Preparations and Procedure

Firearm use

Only pre-approved designated individuals that are active MRT members who have documented their Possesion and Acquisition licence with Security are authorised to shoot a Polar Bear.

Dressing

A preapproved Inuit worker documented by Human Resources with the experience and expertise will attend to field dressing, gutting, skinning, cutting the carcass, if a on-site QIA representative does not identify a desired individual. A Wildlife Carcass Dressing Kit consisting of two 6 inch blades, two 4 inch blades and one sawblade will be provided by the Environment Department.

In the event of polar bear mortality, the following parts must be preserved and delivered to the Conservation Officer:

i. The lower jaw or an undamaged post-canine tooth,
ii. Any lip tattoos present,
iii. Any radio collars or ear tags present, and
iv. Evidence of sex (i.e. penis/baculum).

Carcass Storage

All salvageable parts of the carcass must be delivered to the designated community within 24 hours of the kill if possible. Prior to being delivered and to avoid spoilage, all salvageable wildlife parts must be promptly and

safely stored in a refrigerated place. The meat and salvageable parts should not be stored in a c-can or be allowed to spoil.

Polar Bear Audit

Auditors: _____ Date: _____

_____

Dressing Hardware

☐ Two 6 inch Buck Knives

☐ Two 4 inch Buck Knives

☐ One Sawblade

Fire Arm Approved MRT Members on site

Name	Shift	Room

Preapproved Polar Bear Dressers

Name	Shift	Room

Carcass Sorage Location

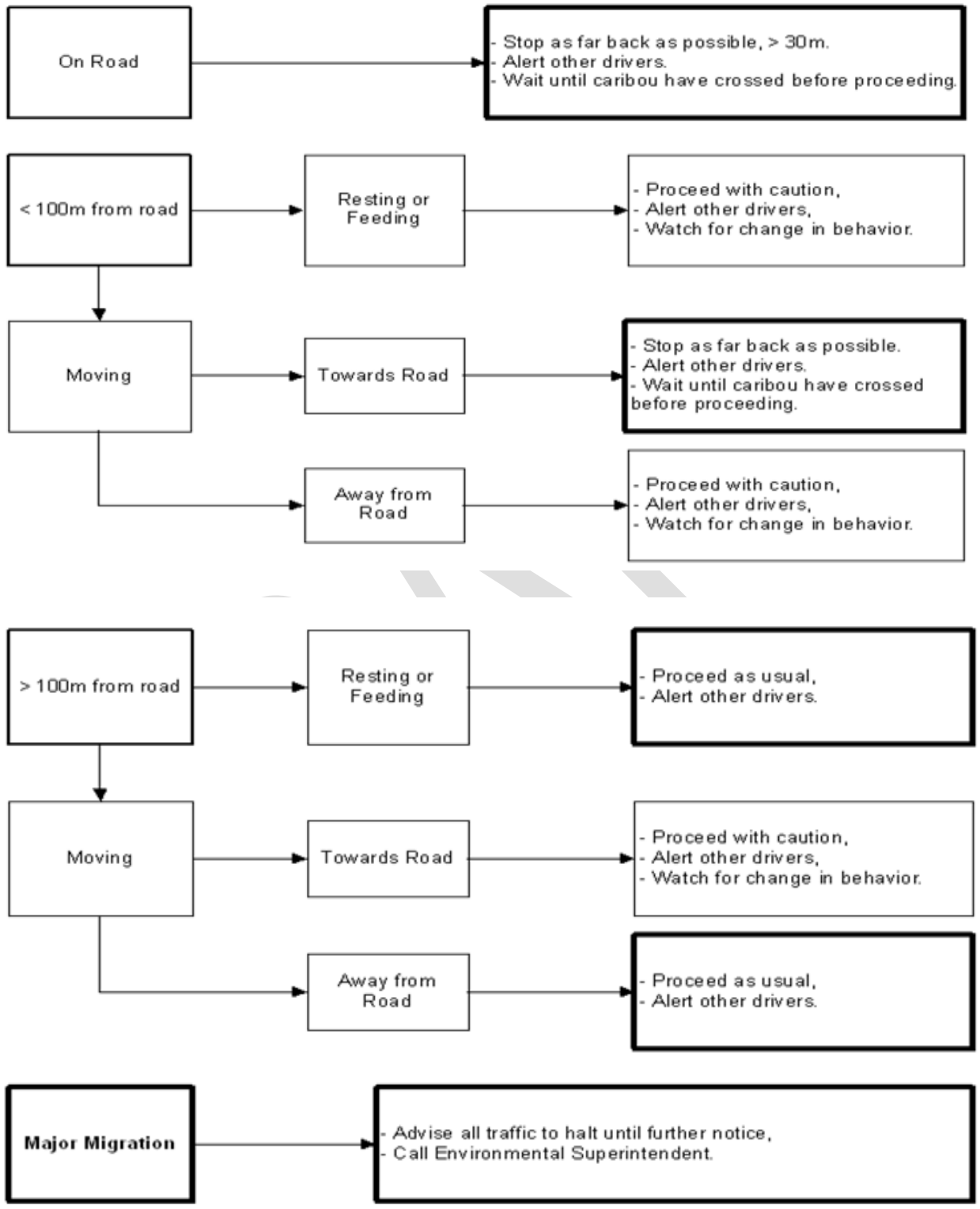
Storage location	Temperature

Carcass Delivery Capabilities

Delivery Method	Delivery Timeline

Comments:

Appendix B-
Caribou Encounters Decision Tree



Appendix C -
Active Migration Bird Surveys Protocol

Table 1. Recommended setback distances for activity near bird nests.

Species Group	Recommended Setbacks Distances (m)	
	Pedestrian / ATV's	Roads/Construction/Inustrial Activity
Songbirds	30	100
Shorebirds	50[a]	100[a]
Terns & Gulls	200[b]	300[b]
Ducks	100	150
Geese	300	500
Loons & Cranes	500	750

a For nests of American Golden Plover or Ruddy Turnstone, these setbacks should be increased to 150 m for pedestrians/ATVs and 300 m for Roads/Construction/Industrial Activities respectively. For nests of Black-bellied Plover, Whimbrel, or Red Knot, these setbacks should be increased to 300 m for pedestrians/ATVs and 500 m for Roads/Construction/Industrial Activities. If field crews are untrained in the identification of these species, then the higher setbacks should be applied for all shorebird species. In areas where several species are nesting in proximity, setbacks for the most sensitive species should be used if they are present.

b For project activities in proximity to nests of Ross's Gull these setbacks should be increased to 500 m for pedestrians/ATVs and 750 m for Roads/Construction/Industrial Activities. The draft Recovery Strategy for Ivory Gull currently identifies the area within a 2 km radius around colonies where at least one individual was observed nesting any time between 2002 and 2009 as Critical Habitat. As a precautionary approach, a 2 km setback should also be applied to any Ivory Gull nest that is encountered in an area that is not currently identified as Critical Habitat in the Recovery Strategy.

For further information, contact Baffinland's on-site Environment Team, or Environment Canada at

Director, Prairie and Northern Region, Canadian Wildlife Service, Environment Canada

Twin Atria Building, Room 200, 4999–98 Avenue, Edmonton AB, T6B 2X3

Phone: 780-951-8850

Further information on incidental take is available on the internet (as of June 2012):

http://www.ec.gc.ca/paom-itmb/default.asp?lang=En&n=FA4AC736-1

EDI ENVIRONMENTAL DYNAMICS INC.

Baffinland Iron Mines Corporation

Mary River Active Migratory Bird Nest Survey (AMBNS) Protocol

ALL ACTIVE BIRD NESTS ARE PROTECTED FROM DISTURBANCE

Federal government regulations protect all active migratory bird nests from disturbance and destruction. Baffinland is committed to the protection of all active bird nests and this AMBNS protocol will be used during the Mary River Project's construction and operation. From 31 May to 31 August, when disturbance (clearing) or other industrial activities occur in previously undisturbed areas, Baffinland will conduct AMBNSs and protect nests and nesting birds with no disturbance buffers around active nests. This guide provides an overview of how to conduct an AMBNS and establish appropriate no disturbance buffers.

Background

The Migratory Birds Regulations, under the Migratory Birds Convention Act (MBCA), 1994, prohibit the harming of migratory birds and the disturbance or destruction of their nests and eggs. The inadvertent destruction of nests and eggs from industrial activity is called "incidental take" and is illegal. Environment Canada, responsible for the MBCA, expects that Baffinland will exercise due diligence to avoid harm to migratory birds, their nests, eggs, and young.

To avoid conflict with nesting birds, clearing should be completed outside of the migratory bird nesting season. In the Mary River Project area, bird nesting activity can occur from 31 May to 31 August. In the event that clearing unavoidably overlaps with the breeding bird season, Baffinland will conduct Active Migratory Bird Nest Surveys (AMBNS) and establish no-disturbance buffers to reduce the likelihood of disturbing or destroying active nest.