

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

Comment No.	Reviewer Comment	Baffinland Response
Comment No.	ECCC Comment	Baffinland Response
ECCC-1	<p>Migratory Birds</p> <p>In section 1.1 of the Project Proposal, Baffinland Iron Mines Corporation (the Proponent) states that based on results from the initial drill program in 2019, the exploration program may be expanded. This expansion would include the sourcing of construction materials from one or two quarries, the construction of access trails and the constructions of a small airstrip. The construction of these features could involve the removal of vegetation. The migratory bird nesting season in the project area is from the end of May until mid-August. It is important to note that breeding periods may vary year to year and that the above general nesting period is provided as guidance only. Paragraph 6(a) of the Migratory Bird Regulations, pursuant to the Migratory Birds Convention Act, states that no one shall disturb or destroy the nests or eggs of migratory birds. The inadvertent harming, killing, disturbance or destruction of migratory birds, nests and eggs is known as incidental take. The Proponent should carry out all phases of the project in a manner that protects migratory birds and avoids harming, killing or disturbing migratory birds or destroying, disturbing or taking their nests or eggs. ECCC recommends that the Proponent conduct all vegetation clearing activities outside of the migratory bird nesting season in order to avoid incidental take.</p>	<p>ECCC's comments regarding the potential to destroy nests and birds when conducting ground disturbance activities during the breeding season are acknowledged. Baffinland recently prepared an Environmental Protection Plan (EPP) specific to Ege Bay. EPP Section 2.13 Bird Protection Measures describes the measures Baffinland will implement to protect birds and avoid the disturbance or destruction of bird nests.</p>
ECCC-2	<p>Waste Management Plan and Spill Contingency Plan</p> <p>In section 1.2 of the Project proposal, the Proponent states that it will apply to the Nunavut Water Board (NWB) to address water use and waste disposal requirements. Furthermore, in section 2.5 of the Project proposal, the Proponent states that its Exploration Spill Contingency Plan is currently under preparation. ECCC believes that the submission of an exploration program specific waste management plan and spill contingency plan is important and looks forward to reviewing these documents in the Proponents Type B Water Licence Application to the NWB. ECCC recommends that the Proponent submit an exploration specific waste management and spill contingency plan in their Type B Water Licence Application to the NWB.</p>	<p>ECCC's comments are acknowledged. Waste management and spill contingency plans will be submitted to the NWB as part of Baffinland's Type B Water Licence Application.</p>
ECCC-3	<p>Quarries</p> <p>In Section 2.6 of the Project proposal, the Proponent states that quarry rock will be assessed for acid rock drainage and metal leaching and that once this potential is assessed, quarry specific management plans will be developed. ECCC looks forward to reviewing these quarry specific management plans. ECCC recommends that the Proponent submit quarry specific management plans that detail the acid rock drainage and metal leaching assessment once they are developed as part of the NWB's water licence process.</p>	<p>The quarry specific management plans will present the ARD/ML assessment results for each quarry.</p>