

**QIA Responses to Baffinland Responses on NIRB Screening of the Ege Bay Exploration Program**

Comment #	Initial QIA Comment	Baffinland Response	QIA Response
QIA-01	Baffinland makes reference to following a number of protection measures outlined in its "Environmental Protection Plan" yet does not provide the plan for review.QIA recommends that Baffinland provides the Environmental Protection Plan as part of the NIRB application process including references to measures specific to this project.	Baffinland believes reviewers are familiar with its Environmental Protection Plan (EPP) for the Mary River Project, available on Baffinland's Document Portal. The EPP and other relevant management plans will be reviewed during the water licensing stage and in concert with feedback from the relevent regulatory agencies and the land owner. Additionally, Baffinland asserts that reviewers do not need to review the specifics in management plans to establish whether or not the Ege Bay Exploration Program is likely to cause significant adverse effects. Having said this, Baffinland has provided a Draft version of the Ege Bay EPP with these responses, to be further updated during the water licencing process.	QIA disagrees with Baffinland's assertion that "reviewers do not need to review the specifics in management plans to establish whether or not the Ege Bay Exploration Program is likely to cause significant adverse effects". It is the quality and substance of a mangement plan that will determine how and when a proponent will be able to mitigate potential negative effects. QIA reitirates our desire to review and comment on final management plans during the NIRB review.
QIA-02	Baffinland makes reference to following a closure and reclamation plan at the conclusion of exploration yet does not provide the plan for review. A project of this scale requires the deployment of a large quantity of infrastructure and supplies. Typically for projects like this, a proponent will provide details pertaining what should happen in the event that they can no longer operate the project.QIA recommends that Baffinland provides the Closure and Reclamation Plan as part of the NIRB application process including references to measures specific to this project. In addition, Baffinland should describe what quantity and type of security they will be posting	Closure and Reclamation Plans as well as the reclamation security estimate is normally provided for review and approval during the water licensing process. Baffinland intends to work closely with the QIA to establish a Closure and Reclamation Plan that meets the QIA's Abandonment and Reclamation Policy for Inuit Owned Lands. Baffinland will submit the Draft Closure and Reclamation Plan for QIA review in concert with the Land Use Application. Reclamation security will be filed with the subsequent application for a Type B Water Licence.	QIA requests the Closure and reclamation plan for review during the NIRB process.
QIA-03	Baffinland states that any spills will be cleaned up in accordance to the "Spill Contingency Plan" yet does not provide sufficient information and does not provide the plan for review.QIA recommends that Baffinland provides the Spill Contingency Plan as part of the NIRB application process including references to measures specific to this project.	As with Closure and Reclamation Plans, Spill Contingency Plans are required plans that are approved under a water licence. As there is a subsequent regulatory process that involves reviewing and determining the adequacy of such a plan, we suggest that such a plan is not required to determine if a project has the potential to cause significant adverse effects. Nonetheless, Baffinland has included its Draft Spill Contingency Plan, to be further updated during the water licencing process.	QIA disagrees with Baffinland's assertion that "reviewers do not need to review the specifics in management plans to establish whether or not the Ege Bay Exploration Program is likely to cause significant adverse effects". It is the quality and substance of a mangement plan that will determine how and when a proponent will be able to mitigate potential negative effects. QIA again reitirates our desire to review and comment on final management plans during the NIRB review.

QIA-04

Baffinland has stated that they will require an IOL Land Use Licence in their project application. They have yet to apply to QIA. Review of an application like this will take time and QIA will need to bring the application to the Community Lands and Resource Committee for review. The sooner we receive the application from Baffinland the better. QIA has implemented changes with regards to its land application process. Just recently, the Qikiqtani Inuit Association has launched a new online Land Use Application Registry that will allow applicants to submit all land use permit applications to QIA online. With this system clients will not only be able to submit applications online but they will also be able to check the status of their project. All communication and documents associated with a project will be held in a single, easily-accessible location online. This online process is meant to replace the current paper based system. Please register with our system to provide all your project information, the online system can be accessed via the QIA website and also at <http://qia.strata360.com/app/>. QIA Recommends that Baffinland applies for a IOL Land Use Licence via <http://qia.strata360.com/app/> as soon as possible so that QIA can initiate the review.

We understand the QIA's comments, and thank you for information regarding QIA's new on-line application process. A hard copy of the Land Use Application was prepared and will be transcribed into the online registration system for submission.

QIA has received the online application and will begin the review once an application fee has been received.

QIA-05

Baffinland has described a current socio-economic status of the region but has stated that potential socio-economic effects will be limited and has failed to identify anyway that this project would benefit the local economy. There is no indication that local businesses would be contracted nor is there a distinct commitment to train or hire local Inuit beginning from exploration start up; QIA recommends that Baffinland provide details as to how they will maximize local opportunities for training, employment, and business involvement.

Section 6.11 of the Project Proposal states: "Baffinland will look for opportunities to engage the communities of Hall Beach and Igloolik in employment, contracting and procurement activities, to help maximize potential socio-economic effects." We believe this is indication of Baffinland's commitment to hire local Inuit. Baffinland plans to preferentially hire from the two closest communities (Hall Beach and Igloolik), and will look for opportunities to contract Inuit companies such as was done during the exploration phase of the Mary River Project. Baffinland is still working out further details. Baffinland currently follows procedures to maximize procurement from Inuit companies on the Mary River Project.

QIA-06

Baffinland states that workers and supplies will be delivered to the camp from Mary River. It is not clear how frequently flights will be going to and from Mary River to Ege Bay. The Proponent also makes reference to plans developed specifically for the Mary River Project without a description on how the plans may be altered specifically to suit Ege Bay. Because of the vicinity of the Mary River Project and its associated infrastructure, QIA has concerns that Baffinland may utilize Mary River for more than a base for workers and some supplies and that the travel corridor between the two may see more traffic than described. QIA requests that Baffinland describes the use, extent and interaction of the Mary River project with the Ege Bay exploration program, as well as identifying the potential impacts of connecting the two projects in this way.

Baffinland has been conducting regional exploration at Ege Bay since 2013 in accordance with its current approvals which allow for such regional exploration. However, the distance between Ege Bay and Mary River is significant, and therefore it is costly and inefficient to operate the Ege Bay Exploration Program from Mary River. As such, Baffinland expects to staff the Ege Bay Exploration Program as an operation separate from the Mary River Project, at least once the exploration camp has been established. Most of the supplies required by Ege Bay will be delivered by sealift to Ege Bay. Mary River will be used as a base during construction of the initial exploration camp. To minimize impacts of flights between Mary River and Ege Bay, Baffinland will adhere to minimum flight altitudes, weather permitting. As soon as reasonably possible, Baffinland plans to establish its Ege Bay exploration workforce, drawing Inuit labour from Hall Beach, Igloolik and possibly Iqaluit.

QIA requests that if approved, NIRB implement a Term and Condition that requests flight schedules be shared with adjacent communities ahead of time to minimize potential impacts. Baffinland states that they "expect to staff the Ege Bay Exploration Program as an operation separate from the Mary River Project, at least once the exploration camp has been established". QIA requests that Baffinland provide a timeline for this interaction. Finally, QIA requests that Baffinland describes how and when the workforce will be flown in from communities and demonstrate the interaction with current flights going in and out of Mary River.

QIA-07

Baffinland states that habitat loss will be relatively limited given the small footprint of the exploration program. Yet Baffinland states that it intends to conduct exploration activities throughout the leased area (approximately 867 square kilometers). Baffinland has not provided enough information about the total potential disturbed land or total exploration area. It is unclear how much area the proponent eventually desires to explore and thus it is impossible to determine the potential impact to the land. QIA requests that Baffinland provide much more detail regarding their proposed activities which includes the area they will explore. This will help detail habitat loss and disturbance.

QIA-08

Baffinland states that over 5 years, the 50 person camp may be expanded to a 100 person camp and subsequently they will implement other activities such as building bulk fuel storage, constructing access trails etc. It is unclear whether some project components are part of the initial start up or the expanded project based on exploration results. This makes reviewing the impact of the Project difficult. QIA requests that Baffinland provide more information in a detailed workplan that defines how the project will evolve over time on a year by year and seasonal basis. QIA also requests that Baffinland be explicit in detailing the maximum level of activities it is currently applying for.

In its Ege Bay Project Proposal, Baffinland has described an exploration program that may grow over the course of a 5-year period, so as to not scope the exploration too narrowly only to incrementally grow the program over time. Exploration drilling will be undertaken at one specific area, the Initial Exploration Area shown in the Project Proposal. Baffinland plans to seek an IOL Land Use Licence to complete the exploration drilling program within the defined footprint of the Initial Exploration Area as described in the Project Proposal. The Potential Development Areas identified in the Project Proposal are as follows:- Initial Exploration Area - 11.39 km<sup>2</sup> (only a small portion of this area will be disturbed by drilling)- Camp/Airstrip/Quarries Area - 1.35 km<sup>2</sup> - considered to be a higher impact area; greater disturbance)- Connecting access road - 0.59 km<sup>2</sup>Grassroots exploration (i.e., geological mapping; geophysical surveys; surface sampling) will also likely continue across the larger land parcel. Baffinland is not seeking to conduct drilling or construct access roads over the entire extent of the parcel. Additional specific targets may be identified for drilling in the future from grassroots exploration. If Baffinland identified additional targets for drilling that are outside of the currently defined exploration footprint, it will talk to the landowner to seek permission through another or amended IOL land use licence.

Baffinland clearly delineated its initial exploration program (the minimum level of activity proposed) in the 5th paragraph of Page 1 of the Project Proposal. Baffinland further described a scenario of maximum exploration activity (to the extent that this is possible; no exploration drilling has been completed to date) within a 5-year timeframe in the 6th paragraph of Page 1. The remainder of the Project Proposal provides additional detail on this, and assesses the impacts of the maximum exploration activity scenario (i.e., 100-person camp, quarrying, access road and airstrip construction). How the exploration program unfolds is dependent upon the exploration results. It is possible that the initial drilling is disappointing and Baffinland abandons the exploration program after one or two years. If initial drilling results are promising, Baffinland could seek to expand to the 100-person camp and nine drills in year 2 or 3. Cognizant of the resources required to review amended applications, Baffinland has provided an analysis of the maximum anticipated extent of the program, within the first 5 years, to allow for a more comprehensive review at the initial stages of the program.

Baffinland states that "It is possible that the initial drilling is disappointing and Baffinland abandons the exploration program after one or two years" Therefore it is imperative that they provide a closure and reclamation plan for review from the onset.

QIA-09

Baffinland states that stationary and mobile equipment will generate noise and that the main sources of noise will include drills, helicopters and airplanes. Baffinland notes that wildlife may be impacted locally only, making specific mention of walrus. This section of mitigation measures fails to describe how Baffinland will reduce noise impacts on caribou migration and possible land users of the region who are known to have a historical link to the area. Finally, Baffinland states that they intend to construct an access road between the camp and exploration area which will reduce demand for helicopter use and will reduce noise in the exploration area. However, the noise generated through sourcing quarried material, building and using the road isn't accounted for in the application. QIA recommends that Baffinland provides a detailed environmental protection plan for review that describes in greater detail how they will minimize noise impacts on wildlife and land users.

There will be noise impacts within the immediate exploration area from overflights, construction activities and operation of mobile equipment. Baffinland will attempt to minimize noise impacts on wildlife and other land users from aircraft by adhering to minimum flight altitudes, where possible. Given the short distance between the exploration camp and exploration area, however, it will not always be possible to adhere to the minimum flight altitude, as is the case with most exploration projects. Constructing an access road or trail has noise and ground disturbance impacts, but ground-based noise sources are considered less intrusive than aircraft. Although construction of road access will help to minimize noise emissions, there are other advantages such as reducing the volumes of fuel required and improve the efficiency of the exploration drilling operation. Specific mitigation measures to reduce noise from mobile equipment has been provided in the EPP. With respect to the EPP, the management plans referenced in the Project Proposal for screening will be provided with the application for a Type B Water Licence. Management plans will be similar to those prepared for the Mary River Project, available on the Document Portal.

QIA requests final versions of management plans for review for this project.

QIA-10

In this section of the application Baffinland states that this project area is not a high use area, based on a Mary River Inuit Knowledge Study and based on consultations with Igloolik and Hall Beach. Baffinland did not provide this study in their application. QIA Recommends that Baffinland provides more detailed information available to them regarding contemporary Inuit land use

The QIA has the same products of the Mary River Inuit Knowledge Study available to them for review. The Mary River Inuit Knowledge Study shows that the Ege Bay area has been used by elders within their lifetime, but the area lies near the outer zone of land use by the five North Baffin communities that participated in the study. Contemporary land use is concentrated closest to each of the communities. This is perhaps best illustrated by the harvest location data of the Nunavut Wildlife Harvest Study (Priest and Usher, 2004). This harvest location information is shown on Figure 3.31 (caribou harvests), Figure 3.33 (marine mammal harvests), Figure 3.35 (waterfowl and egg harvests) and Figure 3.37 (fish harvests) of the land use report presented as Appendix 4C of the Final Environmental Impact Statement for the Mary River Project. These figures have been extracted from that report and are appended to this response. The harvest study data is thought to be the most comprehensive spatial database of harvesting, which largely represents land use in the North Baffin. During consultation on Ege Bay, the following comments were received which acknowledge the Ege Bay area is an area important historically; meeting participants did not indicate that the area is used contemporaneously: (removed quotes)

Use of an area may change over time. QIA requests that Baffinland provide baseline information and a plan to document the use of this area by Inuit and various wildlife into the future.

QIA-11

The Proponent describes camps as mobile, "Camps may be moved during or after the drilling season to minimise mobilisation and travel distances for more advanced exploration activities, primarily exploration drilling [sic]". QIA does not view the construction or relocation of a 100 person camp and supporting infrastructure as a small undertaking. QIA requests that the Proponent clarify whether it intends to build a single camp or multiple camps in the Project Development Area (currently undefined), and whether moving the camp and related infrastructure to a different location is part of this application.

Baffinland acknowledges that the reference sentence is misleading. What was intended was to convey that exploration programs are temporary in nature, and that exploration camps can without significant effort be brought to another exploration area (i.e., to another exploration program away from Ege Bay). Baffinland does not plan to relocate its 50-person or 100-person exploration camp to other locations within the Exploration Agreement Area.

QIA acknowledges that Baffinland will not relocate a camp for the duration of the Ege Bay Project.