



March 12, 2025

Oceans North Recommendations Related to Baffinland's 5 year monitoring plan

Cortney Oliver
Senior Manager, Environmental Social Governance
Baffinland Iron Mines Ltd.
cortney.oliver@baffinland.com

Dear Ms. Oliver,

Thank you for the opportunity to provide comments on Baffinland Iron Mines Limited's draft five-year monitoring plan for the Northern Shipping Route. We believe that including the MEWG in developing monitoring plans is essential to this project's success. As we have stressed in the past, the ecological health of this region and the iron ore resources can, if managed properly, contribute to regional wealth and wellbeing for centuries.

We have one main concern, which we have expressed during prior MEWG meetings – changes to the aerial survey program. Regional aerial surveys are used to estimate the Eclipse Sound narwhal population and provide data on population trends. Baffinland's rationale for reducing the frequency of the marine mammal aerial survey program is that other monitoring programs actively monitor for potential project-related effects on marine mammals, including acoustic monitoring, shore based visual monitoring, satellite tagging and ship-based observations. However each of these other monitoring programs do not provide a key aspect of the aerial survey program – density estimates. Acoustic monitoring cannot provide density estimates and acoustic monitoring is proposed to be reduced to every three years under Baffinland's five-year monitoring plan. Shore based monitoring only provides a localized snap shot. Satellite tagging is not occurring in this region currently (and may not be again) and cannot provide density estimates. And finally, ship-based observations can only see animals within a few kilometers, and then only those that have not already fled the oncoming vessel.

Aerial surveys are also used (along with local visual surveys) to determine the proportion of immature narwhal – an early warning indicator on the health of the population. Despite the repeated assertion that further "early warning indicators be developed" (QIA PIP Technical comments, 2022), this ratio still remains the only early warning indicator, making yearly data essential. Additionally, the WSP/Baffinland 2022 Bruce Head Shore Based Monitoring Report notes that due to variability in both aerial surveys and visual surveys and low sample size in local visual observations "ongoing EWI

(early warning indicator) monitoring through both the Bruce Head Shore-based Monitoring Program and Marine Mammal Aerial Survey Program is therefore recommended.”

Aerial surveys have been conducted from 2019 through to 2023 – this past summer being the first year no data was gathered. We believe that now is not the time to reduce survey effort. We must see a stabilization in narwhal numbers before further reduction in monitoring should be considered. Last spring we had understood that 2024 monitoring was an operational issue (with plane availability) rather than a step towards reducing the program. Though we disagree with Baffinland on the population abundance prior to shipping, and we do agree that there is some exchange between neighbouring fjords, data does not suggest that this population is stable (Table 1).

Table 1. Narwhal abundance estimates for Eclipse Sound

SURVEY YEAR	ABUNDANCE ESTIMATE
2004	20,225
2013	10,489
2016	12,039
2019	9,931
2020	5,018
2021	2,595
2022	4,592
2023	10,492
2024	No survey

The Eclipse Sound narwhal population size has fluctuated greatly since intensive shipping operations began in 2015. While Baffinland’s 2023 estimate suggest an increase in narwhal in Eclipse Sound at the time of its surveys, the aggregate data including harvester reporting suggests population instability and regional decline. We know based on abundant reporting to the NIRB by Inuit, results from Inuit-partnered research by the Scripps Institution of Oceanography, and EIS reports from Baffinland that animals change their behaviours in the presence of vessels (stop foraging, cease bottom dives, change travel directions, change swim speeds, etc.). Any population-level impacts, as a result of these disturbances over the long-term, would take a considerable amount of time to appear, given the longevity of the species and calving rates. Currently, it is unclear what the long-term impacts of repeated daily disturbance are to the narwhal population that summers in the RSA.

We look forward to discussing this at the upcoming MEWG meeting later this month.

Sincerely,



Kristin Westdal
Science Director, Oceans North