



NIRB File No.: [08MN053](#)

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NWB File No.: [2AM-MRY1325](#)

November 26, 2025

Megan Lord-Hoyle

Vice President, Sustainable Development

Oakville Corporate Office-Baffinland Iron Mines Corporation

360 Oakville Place Drive, Suite 300

Oakville, ON, L6H 6K8

Sent via email: megan.lord-hoyle@baffinland.com

Re: The Nunavut Impact Review Board's 2024-2025 Annual Monitoring Report for the Mary River Project and Board's Recommendations

Dear Megan Lord-Hoyle:

The Nunavut Impact Review Board (NIRB or Board) is hereby releasing its 2024-2025 Annual Monitoring Report for Baffinland Iron Mines Corporation's Mary River Project (NIRB File No. 08MN053) along with the NIRB's Assessment of Baffinland Iron Mines Corporation's (Baffinland) Compliance Status with Project Certificate No. 005, Amendment 05¹. This report provides the findings that resulted from the monitoring of the Mary River Project from October 2024 to September 2025.

RECOMMENDATIONS

In regard to the annual reporting, the NIRB notes that the volume of material submitted in the annual report is increasing year by year, which is consistent with the reports submitted for other projects within Nunavut. Much of this information is reporting that is required to be reported to regulatory authorities, or is not strictly required to be reported to the NIRB but is relevant to the public interest. This creates both redundancy that may be unnecessary and an excessive level of documentation in the submitted annual reports that must be reviewed and evaluated by parties. The NIRB will be discussing with Baffinland and other parties regarding this issue.

¹ Based on the NIRB's monitoring activities as set out within the respective Project Certificates, Sections 12.7.1 and 12.7.2 of the Agreement between the Inuit of the Nunavut Settlement Area and Her Majesty the Queen in right of Canada (Nunavut Agreement), and s. 135 of the Nunavut Planning and Project Assessment Act, S.C. 2013, c. 14, s. 2 (NuPPAA).

According to Project Certificate 005 Amendment 05, Section 4.1², the NIRB notes that establishing an online location for non-confidential monitoring and reporting documents would help address issues related to the volume and redundancy of material submitted to the Board. While Baffinland has made some documents available online, the majority remain hosted on the NIRB and NWB registries, which parties have indicated can be difficult to access. This does not meet the intent of the Board's guidance and contributes to the growing volume of material submitted in the Annual Report.

Recommendation 1: Baffinland shall provide an update within 30 days of receiving the NIRB Monitoring Officers' 2025 Report, on the development of a publicly-accessible Project-specific web portal or web page to make available in a central location all significant non-confidential monitoring and reporting information submitted to Regulatory Authorities pursuant to the Project Certificate and other territorial or federal permits issued for the Project.

Recommendation 2: Baffinland shall have a publicly-accessible Project-specific web portal or web page to make available in a central location all significant non-confidential monitoring and reporting information submitted to Regulatory Authorities pursuant to the Project Certificate and other territorial or federal permits issued for the Project in place for the 2026-2027 reporting year.

The Board notes that term and condition 106 states that "*The Proponent shall ensure that shipboard observers are employed during seasons where shipping occurs and provided with the means to effectively carry out assigned duties.*"³. The objective of term and condition 106 is stated as follows: "*To ensure that interactions with marine mammals and Project shipping activities are effectively monitored.*" The text for this term and condition was recommended by the Board during the Board's assessment of the original Mary River Report⁴. The shipboard observer program was initially proposed by Baffinland itself⁵. When identified that Baffinland is not meeting this term and condition, Baffinland indicated that this term and condition remains largely unfulfilled because Baffinland is not using the purpose-built vessels as proposed during the Board's assessment of the original Mary River Project and are encountering difficulties with getting local shipboard observers safely on board the contract

² 12. The Proponent shall establish a Project-specific web portal or web page as a means of making all non-confidential monitoring and reporting information associated with the Project available to the general public. This does not limit what the Proponent may be required to submit to the NIRB or other regulatory authorities to meet reporting requirements.

³ Project Certificate 005 Amendment 5, Term and Condition 106

⁴ see the discussion in the Final Hearing Report, Sept 14, 2012, p 165

⁵ NIRB Final Hearing File No.: 08MN053, Exhibit 66, Baffinland Iron Mines Corporation, Closing Statement, Pond Inlet, July 28, 2012, filed by Baffinland on July 28, 2012

vessels being used for project shipping. While the Board recognizes the safety issue that has arisen, the Board remains concerned that both the express requirement of term and condition 106 and the underlying objective of the term and condition are not being met.

Recommendation 3: Baffinland is required to provide an update of the reasonable measures that are being, or could be, taken for Baffinland to meet the requirements of Term and Condition 106 requiring shipboard observers to be onboard when shipping occurs. If Baffinland determines that the shipboard observer program is no longer practicable, the Proponent shall submit for Board consideration an amended term and condition outlining alternative measures to fulfill the objective of Term and Condition 106.

All documents related to this Monitoring Report are available in [the NIRB Public Registry](#) under [the project dashboard](#). Questions or requests for further clarification regarding the NIRB's monitoring process and its recommendations can be directed to the undersigned at kmorrison@nirb.ca.

Sincerely,



Keith Morrison, B.Sc.
Manager, Project Monitoring
Nunavut Impact Review Board

cc: Mary River Distribution List

Enclosure: The Nunavut Impact Review Board's 2024-2025 Annual Monitoring Report for Baffinland Iron Mines Corp.'s Mary River Project