Baffinland

January 5, 2026

Dionne Filiatrault
Nunavut Impact Review Board
P.O. Box 1360
Cambridge Bay, NU X0B 0C0

Re: Submission of Inuit Stewardship Program (ISP) Reports Related to the Mary River Project

Dear Ms. Filiatrault

Baffinland is grateful for the information that was shared by the Inuit participants in the six reports (the **ISP Reports**) released by the Qikiqtani Inuit Association under the Inuit Stewardship Program (**ISP**) of relevance to the Nunavut Impact Review Board (**NIRB**). The enclosed "***Baffinland ISP Reports Response***" is shared in the spirit of continuing collaboration with Inuit on monitoring and research on areas that Inuit identify as of interest to them.

The ISP Reports are the product of commitments developed between Baffinland and QIA beginning in 2020, some of which were formally recognized under Appendix B of Project Certificate No. 005 (the **Project Certificate**). Baffinland has reviewed the ISP Reports and looks forward to engaging with the Inuit Avatimut Kamattiarnirmut Katimajiit (**IAKK**) on them. As acknowledged by the QIA, Baffinland has funded the establishment of the ISP with $4.2 million dollars in Inuit Certainty Agreement (**ICA**) implementation funding, with an additional $300,000 provided in 2025 for ISP staff salary and administrative support, with QIA directing how those funds were spent. We have also been made aware, through the QIA submission, that the QIA has received additional funding on-top of the amounts above directly from the Government of Canada to support this initiative.

Baffinland strongly supports monitoring and research led by Inuit, which presents an essential opportunity for better understanding, communication and management. Separate from funding to support the establishment of the ISP, Baffinland provides ongoing funding to support other independent Inuit-led initiatives relevant to the Mary River Project, such as the Inuit Led Dust Audit Committee and up to $200,000 in annual funding for community-led programs under the IIBA. Inuit employees are also central to and take key roles in the studies conducted by Baffinland under the Project Certificate and Type A Water Licence. In one of many already existing forms of Inuit Stewardship practiced between Baffinland and QIA under the Mary River Inuit Impact Benefit Agreement (IIBA), Baffinland funds a full-time presence of QIA Environmental Monitors at Mary River to ensure we meet the high standards of environmental management, and their experience is presented directly to the communities through the Annual Project Review Forum. Baffinland also ensures Inuit from the impacted communities participate in the majority of our studies as field assistants and researchers.

Although the ISP Reports have only recently been shared with the NIRB and NWB, it is important context that much of the information on which the ISP Reports are based was collected or shared between 2020 and 2022 and during the reconsideration of the Project Certificate for the Phase 2 Addendum, which was ultimately recommended not to move forward. Baffinland and the QIA have worked together since then on many relevant measures that have been integrated into the Project Certificate (including amendments to terms and conditions and the commitments listed at Appendix B) and the Type A Water Licence as well as Baffinland's environmental management system. As this information is not included in the ISP Reports, the enclosed "***Baffinland ISP Reports Response***" includes a high-level summary of relevant measures within the current Environmental Management System for the Mary River Project related to the topics included in the ISP reports.

As a next step to completing the relevant commitments, Baffinland will be writing to the IAKK to respectfully request a meeting to discuss the ISP Reports, share further details regarding non-ISP studies and measures that are already in place on the relevant topics, and to identify opportunities for collaboration and alignment moving forward. We look forward to continuing this important engagement opportunity between communities and industry.

Regards,

Lou Kamermans
Senior Director, Sustainable Development'
Baffinland Iron Mines Corporation

Cc: Megan Lord-Hoyle, Baffinland

Attachments

Attachment 1 Baffinland ISP Reports Response

Baffinland

January 5, 2026

MEMO

Baffinland ISP Reports Response
January 2026

1. Introduction

Baffinland is grateful for the information that was shared by the Inuit participants in the six reports (the **ISP Reports**) released by the Qikiqtani Inuit Association under the Inuit Stewardship Program (**ISP**) in December 2025. The ISP Reports are the product of commitments developed between Baffinland and QIA beginning in 2020 and formally recognized under Appendix B of Project Certificate No. 005 (the **Project Certificate**). Baffinland has reviewed the ISP Reports and looks forward to engaging with the Inuit Avatimut Kamattiarnirmut Katimajiit (**IAKK**) on them.

No steps are required to be undertaken by the Nunavut Impact Review Board (**NIRB**) or Nunavut Water Board (**NWB**) in relation to the ISP Reports at this time. Baffinland and QIA will discuss how the outcomes of the ISP Reports will be used in updating important Project information. Baffinland may issue future updates to applicable management plans under the existing Baffinland Environmental Management System (**EMS**), which will be submitted to the NIRB and NWB for review and/or approval as required under the Project Certificate and the Type A Water Licence.

Although the ISP Reports have only recently been shared with NIRB and NWB, it is important context to flag that much of the information on which the ISP Reports are based was collected or shared between 2020 and 2022 and in relation to the reconsideration of the Project Certificate for Phase 2, which was ultimately recommended not to move forward. Baffinland and the QIA have worked together on many measures to address various topics that were raised through the Phase 2 reconsideration but remained applicable to the approved Mary River Project.

Inuit were heard, and QIA and Baffinland did not delay taking action on the topics raised. In parallel with the time frame of the development of the ISP Reports, Baffinland applied for and was approved to maintain 6 Mtpa transportation limits through the Northern Transportation Corridor until the end of 2024. These short-term extensions created a procedural opportunity to informally and formally develop additional/modified Project Certificate terms and conditions and Appendix B commitments. These additional and modified terms and conditions and commitments proactively address many of the Phase 2 identified issues that drove the development of the ISP Reports. As this information is not included in the ISP Reports, Baffinland is providing the following high-level summary of relevant measures within the current EMS relevant to each ISP Report.

As a next step to completing the relevant commitments, Baffinland will be writing to the IAKK to respectfully request a meeting to discuss the ISP Reports, share further details regarding non-ISP studies and measures that are already in place on the relevant topics, and to identify opportunities for collaboration and alignment moving forward.

2. Baffinland Support for Establishment of ISP

As acknowledged by the QIA, Baffinland has funded the establishment of the ISP with $4.2 million dollars in Inuit Certainty Agreement (**ICA**) implementation funding, with an additional $300,000 provided in 2025 for ISP staff salary and administrative support, with QIA directing how those funds were spent. Separate from the ISP initiative, Baffinland also funds other independent Inuit-led initiatives, such as the Dust Audit Committee and programs under the IIBA. The ISP was originally envisioned under the ICA to address concerns specific to the Phase 2 reconsideration and although initial ISP commitments did not survive the termination of Phase 2 and the ICA, Baffinland and the QIA agreed to carry a version of the program forward, tailored to the current circumstances of the Mary River Project. Baffinland's support for the establishment of the ISP built on its existing commitments to Inuit stewardship shaped by a shared desire for continuous improvement of integration of IQ and Inuit views in our operations, the Mary River IIBA, the Commercial Lease, regulatory authorizations and best practice.

Baffinland has and will always recognize that Inuit involvement in environmental monitoring tied to the Mary River Project is essential, whether it takes the form of community-led studies or the direct opportunities that see Inuit taking key roles in the studies required under the Project Certificate and Type A Water Licence. Such programs can produce important information to share with regulatory authorities and the public, in particular when the supporting work is grounded in established IQ and western science practices designed to avoid bias and interpretation errors. In addition to providing a mechanism for better understanding of Inuit views and the integration of IQ and western science, with careful planning community-led programs can also grow local technical capacity and provide a meaningful opportunity for direct Inuit and community benefits (rather than inadvertently re-directing financial benefits to non-Inuit Southern firms). Such programs can also be established in a way that makes space for a variety of community perspectives and views.

It is with this spirit and intent that Baffinland has continued to engage with the QIA on the objectives, principles and guiding framework of the ISP and these discussions are ongoing.

3. Overview of EMS Measures in Place Relevant to ISP Reports

a. North Baffin Caribou Inuit Qaujimajatuqangit (IQ) Study

Baffinland recognizes the importance of caribou to Inuit, especially for those that harvest from the North Baffin herd that can interact with the Mary River Project's terrestrial infrastructure. While the current low number of caribou in the North Baffin herd have prevented any meaningful interactions from occurring, Baffinland has continued to implement a comprehensive monitoring and mitigation program, primarily through the Terrestrial Environment Mitigation and Monitoring Plan (**TEMMP**) in accordance with IQ shared that the herd will continue to grow over time. For consideration in tandem with any review of the ISP Report 'North Baffin Caribou Inuit Qaujimajatuqangit (IQ) Study' Baffinland provides the following relevant information.

Terrestrial Wildlife Protections

- Mitigation measures that will reduce the likelihood of reduced habitat effectiveness for caribou include:
    - Sensory disturbances will be limited where possible throughout the year according to activity specific decision frameworks. These decision frameworks are already in place for Tote Road traffic, Steensby Railway traffic, helicopter use and blasting.

  - Active caribou calving sites will be avoided between May 15 and July 15. Where possible, there will be no increase in construction or operational activity within 3 km of the calving sites during this period.
  - If caribou approach a Project activity site before work commences, the animals will be observed on the ground, and if it is obvious that they are being disturbed, work will not commence until they have moved on.
  - 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.
  - At such a time when caribou begin to be encountered regularly along the Tote Road and/or Steensby Railway, a wildlife monitor will be present on-site during the calving season to detect calving activities and trigger additional controls as required
- Mitigation measures that will reduce the likelihood of the Project being a barrier to caribou movement include:
  - Snow management activities will, throughout the winter season, maintain a snowbank height less than 1 m with smooth tops along the Tote Road.
  - Identified trail crossings along the Steensby Railway where the physical structure might be a barrier to caribou movement will be constructed of finer fill material to replicate natural trail conditions
  - Any additional (i.e., beyond those already identified) trail crossings identified during construction or operation will also be modified with gentler slopes and finer fill
  - Wildlife signage at trail crossings along the Tote Road and Steensby Railway for operators.
  - Daily observations will be reported so operators are aware of a potential presence at crossing sites and other areas.
  - If caribou start to migrate through the Project, then the leading caribou will be allowed to cross over the Tote Road undisturbed so that others will follow.
  - Operators along the Tote Road and Steensby Railway will be provided with wildlife awareness training, including known crossing locations.
  - All site personnel entering and exiting the Tote Road will notify site dispatch and/or security. Notifications to road users will include mandatory wildlife reporting.
- Mitigation measures implemented to reduce the likelihood of the Project increasing caribou mortality risk include:
  - Wildlife right-of-way policy on Project roads
  - All site personnel entering and exiting the Tote Road will notify site dispatch and/or security. Notifications to road uses will include mandatory wildlife reporting.
  - Reporting and documentation of all mortalities and near misses is mandatory, and follow-up investigations will be conducted for all mortality events.
  - When caribou are observed on roads a “caribou advisory” will be issued through the site radio network to alert operators and drivers that caribou are in the area
  - Speed limits along Project roads are set at a maximum of 55 km/hr, in combination with the Caribou Decision Framework
  - Any carcasses will be removed from transportation corridors to discourage further collisions (e.g., scavengers).
  - A no-hunting policy for Project personnel will be implemented (notwithstanding the accommodation provided for traditional Inuit activities.

- Whenever practical and not causing a human safety issue, a stop work order will be used when wildlife in the area may become endangered by the work being undertaken.

Traditional Harvesting Support

- Inuit employment and contracting provide harvesters with the resources needed to support traditional harvesting, which is re-confirmed regularly by Inuit employees through the Inuit Employment Survey.
- Provision of fuel, food and transportation for Inuit visiting the Mary River Project, as well as maintenance of local HTO cabins and occasional land use equipment (ATVs and snowmobiles).
- Wildlife Compensation Fund of $750,000 provides mechanism for harvesters to apply for compensation for the loss of harvest opportunities due to the Project.
- Harvesters Enabling Program provides $400,000 (adjusted annually for inflation) to Pond Inlet residents to support harvesters as they adapt to changing conditions for harvesting.

Existing Inuit Stewardship in Environmental Monitoring

- Priority employment of Inuit in Baffinland-led terrestrial monitoring and related programs.
- Funding for impacted community participation in the Terrestrial Environment Working Group.
- IIBA cost recovery provisions for QIA participation in regulatory applications, working groups and technical reviews related to the Mary River Project.
- Funding for the Annual Project Review Forum where Inuit from the affected communities are invited to receive updates on the Project from both QIA and Baffinland and engage in meaningful discussion on topics of greatest interest.
- IIBA Wildlife Monitoring Program provides up to $200,000 (adjusted annually for inflation) to support community led monitoring out of Pond Inlet.

NIRB/NWB Required Monitoring Programs

Baffinland carries out monitoring and research relevant to caribou and other terrestrial wildlife as directed under Project Certificate 005 and with the advice of the Terrestrial Environment Working Group (**TEWG**). The necessary field work and reporting is generally carried out by third party consultants with technical expertise in the necessary field of study. These individuals are generally members of professional associations (such as Registered Professional Biologists and Registered Professional Engineers) that maintain strict codes of ethics, which are in addition to the code of conduct expected of the organizations they work for. Inuit are engaged through every level of the monitoring cycle, including planning, execution, analysis and follow up. Baffinland community consultation is now designed and led by Inuit employees fluent in Inuktitut and English, including Elders from Pond Inlet and Igloolik and dedicated staff in each affected community.

Baffinland carries out a number of terrestrial monitoring programs on varying frequencies, as outlined in a rolling 5 year monitoring schedule. These programs include:

- Aerial Caribou Surveys (led by BIM) – Conducted to document where caribou are found, how many are present, and how they are distributed within the Project's Research Study Area (**RSA**).
- Aerial Caribou Surveys (led by GN) – Provides in kind support to the Government of Nunavut (**GN**) as they carry out aerial caribou surveys for the North Baffin caribou herd. Surveys for

population abundance and composition provide important indicators for the health of the caribou herd.

- Caribou Collaring Program – Provides in kind support to the Government of Nunavut as they carry out caribou collaring programs for the North Baffin caribou herd. Collaring can help understand North Baffin caribou movement in relation to the Project
- Height of Land Program – Uses field observations and remote wildlife cameras to understand how wildlife, including caribou, use habitat around the mine and how they respond to human activities.
- Snowbank Height Monitoring – Ensures snowbanks along roads stay under 1 metre in height. This helps wildlife cross safely and improves driver visibility to reduce the risk of collisions.
- Snow Track Surveys – assesses wildlife response to the Tote Road, particularly for caribou.
- Incidental Wildlife Observations – All Baffinland staff are encouraged to observe and report for wildlife when present in proximity to the Project.

Related Terrestrial Monitoring Program

- Vegetation Abundance Monitoring and Soil and Vegetation Base Metals Monitoring Program – Tracks changes in vegetation abundance and types over time at different distances from the Mary River Project. The program also collects soil and vegetation samples to measure metal levels and confirm they remain within acceptable environmental guidelines.
- Northern Contaminants Program (**NCP**) – Baffinland supports this Government of Nunavut program, which encourages Hunters and Trappers with tags to submit caribou samples for testing to monitor metal contaminants.
- Satellite Dust Imagery Analysis – Started in 2020 in response to concerns from the Mittimatalik HTO. This program uses satellite images, along with dust canisters, to detect and track the extent of dustfall across the project area and in locations identified by the community.
- Passive Dust Monitoring – Measures dustfall levels at both the Mary River mine site and Milne Port to track patterns and ensure dust is monitored consistently over time.

Each year a program is carried out it is included in the Terrestrial Environment Annual Monitoring Report and results are attached to that year's Annual Report to the NIRB, which Baffinland prepares as a matter of compliance against Project Certificate 005. The programs are also summarized in the Popular Summary to the Annual Report to NIRB, and as required in relation to specific Term and Condition updates. The Annual Report to NIRB is translated into Inuktitut and provided in print directly to the Hamlets and Hunter and Trapper Organizations in each affected community; the entire Annual Report to NIRB is also provided to those organizations in a hard drive in addition to be accessible through the NIRB Registry and Baffinland's hosted document portal.

b. ISP Report Inuit Qaujimajatuqangit of Freshwater Study for Baffinland's Mary River Project – Specific to the Community of Mittimatalik (Pond Inlet)

Baffinland recognizes the importance of freshwater to Inuit, especially for those that may consume freshwater on the land, use it in their tea, or use it for the harvest of Arctic char in the Mary River Project Area. Baffinland is subject to strict regulatory requirements with respect to any potential impacts on the quality and quantity of surrounding waters. These requirements are included and outlined in the Project Certificate, Type A Water License, Fisheries Act Authorizations, the Canadian Environmental Protection Act, the Metals and Diamond Mining Effluent Regulations, and more. Baffinland maintains a comprehensive network of management plans to ensure monitoring and

mitigation strategies satisfy the highest standards. These include the Environmental Protection Plan (**EPP**), Surface Water and Aquatic Ecosystems Management Plan (**SWAEMP**), Fresh Water Supply, Sewage and Wastewater Management Plan (**FWSSWMP**), Aquatic Effects Monitoring Plan (**AEMP**), Roads Management Plan (**RMP**) and the Snow Management Plan (**SMP**). For consideration in tandem with any review of the ISP Report 'ISP Report Inuit Qaujimajatuqangit of Freshwater Study for Baffinland's Mary River Project – Specific to the Community of Mittimatalik (Pond Inlet)' Baffinland provides the following mitigations relevant to the freshwater environment. Note that Baffinland implements an extensive number of mitigations related to the freshwater environment and has only provided a small sample of select measures here for brevity.

Mitigations for Freshwater Use

- Only approved water sources under the Type A Water License can be used for Project activities.
- Reclaimed water can be used from Project treatment facilities, surface water ponds and embankment dams and approved discharge locations if the water from these sources meet the appropriate discharge criteria for the facility.
- 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 water bodies through the implementation of sediment control measures and proper hazardous materials management practices.
- All water intake hoses shall be equipped with a screen of an appropriate mesh size, consistent with the requirements of DFO's Interim Code of Practice: End-of-pipe fish protection screens for small water intakes in freshwater (2020) 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 the banks of any water body.
- Equipment shall not be washed in any watercourse or water body.
- No fueling and/or servicing of equipment shall occur within 31 meters of any water body.
- Removal of material below the OHWM of any water body is prohibited unless the work has been approved by the NWB.

Mitigations for Tote Road Watercourse Crossing Installation

- Culverts will be installed in accordance with approved plans. Changes to Project water crossings and new crossing installations require regulatory approval.
- Limit any in-stream activity, as much as possible, to low flow or frozen conditions and avoid
- conducting work proceeding or during large precipitation or runoff events.
- Limit the duration of in-water works, undertakings and activities so that it does not diminish the ability of fish to carry out one or more of their life processes (e.g. spawning, rearing, feeding, migrating).
- Baffin Island has a restricted activity timing window for Arctic Char from September 1 to June 30, during which in-stream work should be avoided. The restricted activity timing window does not apply to zero flow conditions when a water body is frozen to the bed.
- Sediment and erosion control measures shall be implemented prior to work and shall be left in place and maintained until all disturbed areas have been stabilized.
- Any stockpiled materials shall be stored and stabilized 31 metres away from the OHWM of any waterbody, unless for immediate use.

- Stream banks shall not be cut and material from below the OHWM of a water body shall not be removed, unless specifically authorized.
- Stabilize crossing approaches during construction to control runoff of sediment-laden water and erosion.
- Minimize in-water work to the shortest amount of time practicable.
- Machinery is not permitted to travel up the stream bed and fording of any water body is to be kept to a minimum and limited to one area.
- Backfill water crossings with substrate (fill) material that is clean, competent, and consistent with the existing substrate size and texture found within the watercourse and will remain in/under the crossing.

Mitigations for Fugitive Dust

- Specific actions that have been implemented, or could be further implemented by Baffinland for dust management at Milne Port have included:
    - redesigning the ore pads to position fines in the centre and lump around the margins
    - minimizing drop distances (i.e., using adjustable stackers) for stockpiling activities.
    - installation of rubber bellows at the end of each stacker to minimize dispersion of dust generated during the fall
    - installation of chutes on the shiploader to prevent windblown dust during loading operations
    - installation of shrouding at the discharge end of the ore stackers to reduce the effect of windblown dust during stacking activities
    - removal of dust impacted snow at strategic locations at the project.
    - application of a specialized crusting agent (DusTreat®) to the ore stockpile to reduce wind erosion and mobilization of fine iron ore particles.
- Specific actions that have been implemented, or could be further implemented by Baffinland for dust management for vehicle traffic include:
    - regulating speed limits
    - utilizing water and dust suppressants during snow free months.
    - application of new dust suppression products with increased durability and longevity for site infrastructure and approved for use in Nunavut on unpaved roads (DustBlokr)
- Specific actions that have been implemented, or could be further implemented by Baffinland for dust management at the crushing facility include:
    - application of dust suppressants (DusTreat) to ore as it exits the crushers, preventing dust generation at multiple down stream ore handling and stockpiling points
    - installation of shrouding and other engineered controls on conveyors
    - moving and enclosing crushing facilities as the Steensby Components are developed
    - use of de-dusting equipment (e.g. baghouses) in the indoor crushing and screening facilities to reduce fugitive emissions of dust and particulate matter
    - minimizing drop distances (i.e., using adjustable stackers) for stockpiling activities.
- Baffinland maintains a Dust Audit Committee, which meets regularly to provide insight into current concerns regarding dust from the Project, and recommends mitigations for evaluation and, if feasible and effective, implementation by Baffinland. Recommendations evaluated and/or implemented to date include:
    - strategic evaluation and installation of wind fencing

- application of additional dust suppressants (DustBlokr, DusTreat) to the airstrip and other stockpiles
- revisions to blasting management plans and practices
- continuous dust monitoring at PDA boundaries
- ongoing involvement of Inuit in dust management
- other operational practice improvements

Traditional Harvesting Support measures and existing Inuit stewardship in environmental monitoring are described above in Section A.

NIRB/NWB Required Monitoring Programs

Baffinland carries out monitoring and research in the freshwater environment as directed under Project Certificate 005, the Type A Water License and author authorizations and regulations, and from time to time with the advice of the TEWG. The necessary field work and reporting is generally carried out by third party consultants with technical expertise in the necessary field of study. These individuals are generally members of professional associations (such as Registered Professional Biologists and Registered Professional Engineers) that maintain strict code of ethics, which are in addition to the code of conduct expected of the organizations they work for. Inuit are engaged through every level of the monitoring cycle, including planning, execution, analysis and follow up. Baffinland community consultation is now designed and led by Inuit employees fluent in Inuktitut and English, including Elders from Pond Inlet and Igloolik and dedicated staff in each affected community.

Baffinland carries out a number of freshwater monitoring programs on varying frequencies, as outlined in multiple management plans. These programs include:

- SWAEMP and TRMP – These programs monitor water quality along the Tote Road and across the site to identify and address potential impacts from project activities on natural watercourses within the project development area. Continuous maintenance of culverts and erosion and sediment control measures (including check dams, sediment ponds, silt fencing, riprap, coir logs, floc blocs, spring berms, etc.) ensures unimpeded flow and helps maintain water quality within established thresholds.
- FWSSWMP – This plan directs employees to maximize the use of recycled water sources wherever feasible, thereby minimizing any potential impact on freshwater availability.
- SNP – Annual hydrometric and water quality monitoring is conducted under these programs, and to date Baffinland has not observed any persistent negative effects on water quantity or quality evaluated under water licence conditions.
- MDMER – In accordance with regulatory requirements, Baffinland monitors and characterizes water discharged from the sedimentation ponds to ensure compliance.
- Long-Term Water Management Plan – Developed in 2021 in response to elevated sediment levels identified at site; outlines long-term mitigation measures. Several components have already been constructed, and adaptive management continues to be applied to address challenges posed by the site's unique environmental conditions.
- CREMP/AEMP – Provides a comprehensive aquatic monitoring assessment on an annual basis of the cumulative affects of discharged effluents and ore dust on lakes and streams within the project area. The component studies include, but are not limited to, Lake Sedimentation Monitoring Program, Dustfall Monitoring Program, Arctic char populations and health, Benthic Invertebrate population and composition, water quality, and phytoplankton response to nutrient inputs.

- Fish Habitat Assessments – Conducted to verify that habitat conditions are not adversely altered, that water quality changes do not impede habitat function, and to document ongoing fish presence and use within and adjacent to the project area.
- Milne Freshwater Fish Health Study – Conducted in collaboration with the Hunters and Trappers Association (**HTO**), and implemented in 2021, 2022, and in 2024 to conduct assessments of Arctic charr populations in lakes near Milne Port to evaluate fish health, tissue contaminants, and life-history patterns, confirming that water quality and fish condition remain within expected natural ranges and identifying any changes that may require further management.

Each year a program is carried out it is developed into a dedicated report and attached to that years Annual QIA & NWB Report for Operations and, where necessary, attached to that year's Annual Report to the NIRB, which are prepared as a matter of compliance against the Type A Water License and Project Certificate 005, respectively. The programs are summarized in the Popular Summaries of the Annual QIA & NWB Report for Operations and the Annual Report to NIRB. The Annual Report to NIRB, translated into Inuktitut and provided in print directly to the Hamlets and Hunter and Trapper Organizations in each affected community; the entire Annual Report to NIRB is also provided to those organizations in a hard drive in addition to being accessible through the NIRB Registry and Baffinland's own document portal.

c. Community-based monitoring of contaminants in snow and lichen near the Mary River project

Baffinland recognizes the importance of snow to Inuit, especially for those that may melt and consume snow on the land or use it in their tea Baffinland has continued to implement a comprehensive monitoring and mitigation program, primarily through the Air Quality and Noise Abatement Management Plan (**AQNAMP**), Terrestrial Environment Mitigation and Monitoring Plan (**TEMMP**) and the Aquatics Environment Management Plan (**AEMP**). For consideration in tandem with any review of the 'Community-based monitoring of contaminants in snow and lichen near the Mary River project' Baffinland provides the following relevant information:

Mitigations, Traditional Harvesting Support and Existing Inuit Stewardship in Environmental Monitoring

Traditional Harvesting Support measures and existing Inuit stewardship in environmental monitoring are described above in Section A. A comprehensive list of Baffinland's mitigations for fugitive dust are provided above in Section B.

NIRB/NWB Required Monitoring Programs

Baffinland carries out monitoring and research relevant to snow and lichen as directed under Project Certificate 005 and with the advice of the TEWG. The necessary field work and reporting is generally carried out by third party consultants with technical expertise in the necessary field of study. These individuals are generally members of professional associations (such as Registered Professional Biologists and Registered Professional Engineers) that maintain strict code of ethics, which are in addition to the code of conduct expected of the organizations they work for. Inuit are engaged through every level of the monitoring cycle, including planning, execution, analysis and follow up. Baffinland community consultation is now designed and led by Inuit employees fluent in Inuktitut and English, including Elders from Pond Inlet and Igloolik and dedicated staff in each affected community.

Baffinland carries out a number of terrestrial monitoring programs on varying frequencies, as outlined in a rolling 5 year monitoring schedule. These programs include:

- Vegetation Abundance Monitoring and Soil and Vegetation Base Metals Monitoring Program – Tracks changes in vegetation abundance and types over time at different distances from the Mary River Project. The program also collects soil and vegetation samples to measure metal levels and confirm they remain within acceptable environmental guidelines.
- Northern Contaminants Program (**NCP**) – Baffinland supports this Government of Nunavut program, which encourages Hunters and Trappers with tags to submit caribou samples for testing to monitor metal contaminants.
- Satellite Dust Imagery Analysis – Started in 2020 in response to concerns from the Mittimatalik HTO. This program uses satellite images, along with dust canisters, to detect and track the extent of dustfall across the project area and in locations identified by the community.
- Passive Dust Monitoring – Measures dustfall levels at both the Mary River mine site and Milne Port to track patterns and ensure dust is monitored consistently over time.

Baffinland also carries out a number of aquatics monitoring programs on varying frequencies, as outlined in a rolling 5 year monitoring schedule. These Programs are listed above in Section B.

Each year a program is carried out it is developed into a dedicated report and attached to that years Annual QIA & NWB Report for Operations and, where necessary, attached to that years Annual Report to the NIRB, which are prepared as a matter of compliance against the Type A Water License and Project Certificate 005, respectively. The programs are summarized in the Popular Summaries of the Annual QIA & NWB Report for Operations and the Annual Report to NIRB. The Annual Report to NIRB, translated into Inuktitut and provided in print directly to the Hamlets and Hunter and Trapper Organizations in each affected community; the entire Annual Report to NIRB is also provided to those organizations in a hard drive in addition to being accessible through the NIRB Registry and Baffinland's own document portal.

d. Community-based monitoring of contaminants in marine sediment and biota near the Milne Inlet industrial port

Baffinland recognizes the importance of the marine environment to Inuit, especially those that harvest in the waters overlapping and adjacent to Milne Port. Baffinland has continued to implement a comprehensive monitoring and mitigation program, primarily through the Shipping and Marine Wildlife Management Plan (**SMWMP**) and the Marine Monitoring Plan (**MMP**). For consideration in tandem with any review of the ISP Report 'Community-based monitoring of contaminants in marine sediment and biota near the Milne Inlet industrial port' Baffinland provides the following relevant information.

Mitigations, Traditional Harvesting Support and Existing Inuit Stewardship in Environmental Monitoring

Traditional Harvesting Support measures and existing Inuit stewardship in environmental monitoring are described above in Section A. A comprehensive list of Baffinland's mitigations for freshwater use (which can terminate in Milne Inlet) and fugitive dust are provided above in Section B.

NIRB/NWB Required Monitoring Programs Baffinland carried out monitoring and research relevant to the marine environment as directed under Project Certificate 005 and with the advice of the Marine Environment Working Group (**MEWG**). The necessary field work and reporting is generally carried out by third party consultants with technical expertise in the necessary field of study. These individuals are generally members of professional associations (such as Registered Professional Biologists and

Registered Professional Engineers) that maintain strict code of ethics, which are in addition to the code of conduct expected of the organizations they work for. Inuit are engaged through every level of the monitoring cycle, including planning, execution, analysis and follow up. Baffinland community consultation is now designed and led by Inuit employees fluent in Inuktitut and English, including Elders from Pond Inlet and Igloolik and dedicated staff in each affected community.

Baffinland carries out a number of marine monitoring programs on varying frequencies, as outlined in a rolling 5 year monitoring schedule. These programs include:

- Marine Water Quality - Monitor potential changes in receiving environment water quality at two marine discharge points associated with site drainage (i.e., run-off), treated effluent discharge and settlement pond discharge from the iron ore stockpiles at Milne Port.
- Marine Sediment Quality – Monitors the condition of sediments at eight stations in Milne Port. The purpose is to determine whether the use of larger ore carriers or other project activities are affecting the quality of the seabed.
- Benthic Infauna Monitoring – Benthic infauna represents a biological indicator of environmental change in the marine environment and a potential pathway for contaminants to enter and/or affect the marine food web at higher trophic levels (i.e., fish and marine mammals).
- Substrate, Macroalgae, and Benthic Epifauna Monitoring – This part of the program examines the surface of the seabed, seaweed (macroalgae), and animals that live on top of the seabed (epifauna). Monitoring is carried out both at Milne Port and at a nearby reference site.
- Ballast Water Monitoring - Monitoring of salinity levels in ballast water to verify exchange of ballast in accordance with Ballast Water Regulations.
- Fish Community – Sampling to monitor the abundance and diversity of the fish community and compare changes over time and in relation to proximity to the ore dock and other port activities.
- Non-Indigenous and Aquatic Invasive Species (**NIS/AIS**) – This component involves collecting marine samples to screen for invasive or non-native species that could be introduced through shipping or other project-related pathways.

Each year a program is carried out a corresponding monitoring report is attached to that years Annual Report to the NIRB, which Baffinland prepares as a matter of compliance against Project Certificate 005. These programs are also summarized in the Popular Summary to the Annual Report to NIRB, and as required in relation to specific Term and Condition updates. The Annual Report to NIRB is translated into Inuktitut and provided in print directly to the Hamlets and Hunter and Trapper Organizations in each affected community; the entire Annual Report to NIRB is also provided to those organizations in a hard drive in addition to be accessible through the NIRB Registry and Baffinland's hosted document portal.

e. Inuit Qaujimajatuqangit and Narwhal in Eclipse Sound and Admiralty Inlet

Baffinland recognizes the importance of narwhal to Inuit, especially those that harvest narwhal in the waters overlapping and adjacent to Baffinland's Northern Shipping Route. Baffinland has developed a world class approach to shipping mitigations and marine monitoring, outlined in the Shipping and Marine Wildlife Management Plan and the Marine Monitoring Plan, respectively. For consideration in tandem with any review of the ISP Report 'Inuit Qaujimajatuqangit and Narwhal in Eclipse Sound and Admiralty Inlet' Baffinland provides the following relevant information.

Marine Mammal Protections

- Vessel traffic management, including:
  - No shipping commences before a continuous route of 3/10ths or less is present
  - Control on entry and exit of Baffinland vessels in the Marine Regional Study Area (**Marine RSA**)
  - Fixed shipping route with detailed navigation instructions
  - Limit on drifting for safety purposes only
  - Speed limit of 9 knots for all vessels transiting through the Marine RSA
  - Convoying of vessels where possible
  - Tug support for berthing and other Milne Port operations
  - Publicly available compliance system for route and speed deviations
- Direction in event of wildlife interactions, including:
  - When marine mammals appear to be trapped or disturbed by Project vessel movements, the vessel will implement appropriate measures to mitigate disturbance, including stoppage of movement until wildlife move away from the immediate area (as safe navigation allows).
  - All Project vessels will be provided with standard instructions to operate their vessel in a manner that avoids separating an individual member(s) of a group of marine mammals from other members of the group.
  - All Project vessels will be provided with standard instructions to not approach within 300 m of a walrus or polar bear observed on sea ice.
- Strict fuel offloading procedures and emergency response preparedness at Milne Port to prevent and respond to spills, respectively.

Traditional Harvesting Support

- Traditional Harvesting Support measures are described above in Section A.
- Tasiuqtiit Agreement provided $10,000 for every vessel required to transport more than 4.2 mtpa through the Northern shipping route, to be used towards community wellness funding as determined by the Hamlet of Pond Inlet and the MHTO.

Existing Inuit Stewardship in Environmental Monitoring

- Inuit stewardship in environmental monitoring are described above in Section A.
- Regular pre and post shipping meetings in Pond Inlet to inform each year's shipping season.
- Marine Research Equipment in the form of a research vessel is provided to North Baffin communities every three years to support marine based initiatives of their choosing.

NIRB/NWB Required Monitoring Programs

Baffinland carried out monitoring and research relevant to narwhal and other marine mammals as directed under Project Certificate 005 and with the advice of the Marine Environment Working Group (**MEWG**). The necessary field work and reporting is generally carried out by third party consultants with technical expertise in the necessary field of study. These individuals are generally members of professional associations (such as Registered Professional Biologists and Registered Professional Engineers) that maintain strict code of ethics, which are in addition to the code of conduct expected of the organizations they work for. Inuit are engaged through every level of the monitoring cycle, including planning, execution, analysis and follow up. Baffinland community consultation is now designed and led by Inuit employees fluent in Inuktitut and English, including Elders from Pond Inlet and Igloolik and dedicated staff in each affected community.

Baffinland carries out a number of marine mammal monitoring programs on varying frequencies, as outlined in a rolling 5 year monitoring schedule. These programs include:

- Marine Mammal Aerial Surveys – Systematic aerial-based abundance surveys to assess regional-level changes in narwhal abundance and distribution in RSA (Eclipse Sound summer stock) and adjacent Admiralty Inlet summer stock area. Targeted low altitude surveys area also undertaken to assess changes in the proportion of immature narwhal relative to adult population.
- Bruce Head Shore-Based Monitoring Program – Systematic shore-based monitoring (visual observer and drone-based surveys) to assess local-level changes in narwhal relative abundance, distribution, group composition and behaviour in direct response to ship traffic.
- Ship Based Observation Program – Vessel-based monitoring program used to assess ship strike occurrence and changes in relative abundance and behaviour.
- Passive Acoustic Monitoring – Deployment of automated acoustic recorders to characterize ambient noise and ship noise relevant to established marine mammal acoustic disturbance criteria and relevant to species specific hearing abilities to determine the level of acoustic masking (i.e., Listening Range Reduction) that marine mammals in the receiving environment may experience.
- Narwhal Tagging Studies – Deployment of high-resolution location (satellite based) and dive tags on narwhal to determine their behavioural responses (surface and dive behaviour response variables) to Project and non-Project ships transiting in the RSA.
- Ringed Seal Aerial Survey Program - Systematic aerial-based and thermal imagery surveys during late spring to assess regional-level changes in ringed seal density and distribution in RSA.

Each year a program is carried out a corresponding monitoring report is attached to that years Annual Report to the NIRB, which Baffinland prepares as a matter of compliance against Project Certificate 005. These programs are also summarized in the Popular Summary to the Annual Report to NIRB, and as required in relation to specific Term and Condition updates. The Annual Report to NIRB is translated into Inuktitut and provided in print directly to the Hamlets and Hunter and Trapper Organizations in each affected community; the entire Annual Report to NIRB is also provided to those organizations in a hard drive in addition to be accessible through the NIRB Registry and Baffinland's hosted document portal.

f. Food baseline study on the quality of narwhal, ringed seal and Arctic char in Eclipse Sound and Milne Inlet, Nunavut

Baffinland recognizes the importance of narwhal, ringed seal and Arctic char to Inuit, especially those that harvest narwhal, ringed seal and Arctic char in the waters overlapping and adjacent to Baffinland's Northern Shipping Route. Baffinland has developed a world class approach to shipping mitigations and marine monitoring, outlined in the Shipping and Marine Wildlife Management Plan and the Marine Monitoring Plan, respectively. For consideration in tandem with any review of the ISP Report 'Food baseline study on the quality of narwhal, ringed seal and Arctic char in Eclipse Sound and Milne Inlet, Nunavut' Baffinland provides the following relevant information.

Mitigations, Traditional Harvesting Support and Existing Inuit Stewardship in Environmental Monitoring

Comprehensive lists of Baffinland's mitigations for marine environments in Section D and for marine mammal protections are provided above in Section E. Traditional Harvesting Support measures and existing Inuit stewardship in environmental monitoring are described above in Section A and D.

NIRB/NWB Required Monitoring Programs

Baffinland carries out monitoring and research relevant to narwhal, ringed seals and Arctic char as directed under Project Certificate 005 and with the advice of the Marine Environment Working Group (MEWG). The necessary field work and reporting is generally carried out by third party consultants with technical expertise in the necessary field of study. These individuals are generally members of professional associations (such as Registered Professional Biologists and Registered Professional Engineers) that maintain strict code of ethics, which are in addition to the code of conduct expected of the organizations they work for. Inuit are engaged through every level of the monitoring cycle, including planning, execution, analysis and follow up. Baffinland community consultation is now designed and led by Inuit employees fluent in Inuktitut and English, including Elders from Pond Inlet and Igloolik and dedicated staff in each affected community.

Baffinland carries out a number of marine environment monitoring programs on varying frequencies, as outlined in a rolling 5 year monitoring schedule. A list of these programs are provided for marine environments in Section D and for marine mammal protections are provided above in Section E. Each year a program is carried out a corresponding monitoring report is attached to that years Annual Report to the NIRB, which Baffinland prepares as a matter of compliance against Project Certificate 005. These programs are also summarized in the Popular Summary to the Annual Report to NIRB, and as required in relation to specific Term and Condition updates. The Annual Report to NIRB is translated into Inuktitut and provided in print directly to the Hamlets and Hunter and Trapper Organizations in each affected community; the entire Annual Report to NIRB is also provided to those organizations in a hard drive in addition to be accessible through the NIRB Registry and Baffinland's hosted document portal.

4. Conclusion

Baffinland uses the outcomes from its Project Certificate and Type A Water Licence studies as well as other available studies (including community-led, government-led and academic) to make decisions about how to operate its project to ensure that the environment in which we operate is protected and negative cultural impacts to Inuit are avoided as much as possible. All Mary River Project regulatory monitoring programs have undergone review by multiple parties including technical experts supporting the QIA, members of the Hunters and Trappers Organizations in each of the five impacted communities through the Environmental Working Groups, feedback through direct community engagement including the Shipping Monitor Program in Pond Inlet and the pre- and post- season shipping meetings in Pond Inlet each year, and the Inuit Dust Audit Committee. We look forward to continuing to work closely with QIA, hunters and trappers organizations, communities, and Inuit through continued collaboration, constructive engagement, and shared commitment to advancing initiatives that continue to improve the Mary River Project.

Baffinland appreciates that the ISP and IAKK operates at arms length from the QIA and as a result, the IAKK does not yet have the level of familiarity with Baffinland's mitigations and monitoring programs that QIA has. To help address this gap and support the ISP program, Baffinland will be requesting the opportunity for an in-person meeting in 2026 with the IAKK.

Baffinland recognizes these are the first reports out of the ISP program and has respectful considerations and feedback to share and discuss directly with IAKK. While reasonable and respectful disagreements between subject matter experts are understandable and an important part of the process, sharing misleading information is not. We believe that there are some misunderstandings which have resulted in some conclusions and recommendations that are not supported by the rationale presented. In some cases, recommendations were made for studies that Baffinland is already doing and measures that have already been implemented, and we would like the opportunity to share these details directly with IAKK as well.

We hope to be able to collaborate more closely with the IAKK on the outcomes of these studies and will report back to the NIRB and NWB as required.