



NIRB File No.: 08MN053

January 16, 2026

To: *Mary River Distribution List*

Re: ***CORRECTED* Update on the NIRB's development of a Cumulative Effects Assessment Framework for Baffinland Iron Mines Corporation's Mary River Project**

Dear Parties:

Recently, the Nunavut Impact Review Board (NIRB or Board) established a multi-party steering committee to support the development of an updated Cumulative Effects Assessment Framework (CEAF) which will set an agreed-upon scope and methodology for an evaluation of current cumulative effects monitoring (both project-based and regional) and guide future impact assessments associated with Baffinland Iron Mines Corporation's (Baffinland) Mary River Project. The NIRB is pleased to announce that representatives from Baffinland, Nunavut Tunngavik Inc., Qikiqtani Inuit Association, Government of Nunavut and the Government of Canada are participating in the CEAF Steering Committee and will be guiding this initiative moving forward. A project charter and other supporting documents are currently being finalized and will be shared publicly through a dedicated space on the NIRB website in the coming weeks.

A discussion paper is being prepared by the NIRB with contributions from the Steering Committee to provide background information and support the development of the CEAF. The discussion paper will build awareness of how the potential for cumulative effects associated with the Mary River Project is considered within the unique legislative framework of Nunavut for resource development, project assessment, project monitoring and regional cumulative effects monitoring. A summary of regional research and monitoring programs will also be prepared as well as background documentation on the Mary River Project and Cumulative Effects to include a compilation of past cumulative effects assessments, assumptions and supporting data for each selected Key Valued Component from the Mary River Project and associated amendments.

Collectively this information and a robust public engagement process are intended to support achieving the following goals that have been identified for the development of the CEAF:

1. **Improve the assessment of cumulative effects in future amendment applications:**
Development of updated cumulative effects assessment guidelines for future amendment applications for the Mary River Project (e.g. adding Deposit 2 and 3 to the current Approved Project) with consideration for the extensive monitoring experience for the Mary

River Project and commitments made by the Proponent to update the approach to cumulative effects assessment in the SOP2 amendment application.

2. **Improve the monitoring, mitigation and management of cumulative effects for the approved Project:** Identification of potential improvements for the monitoring, mitigation and management of cumulative effects through a review of existing cumulative effects assessment conclusions from previous impact assessments for the approved Mary River Project and an evaluation of the existing monitoring program for the Mary River Project. This may include modifications to annual reporting format to more clearly present where monitoring results are compared to impact predictions and, where necessary, outline where cumulative effects may be occurring and develop recommendations for the Mary River Project during the annual NIRB monitoring process.
3. **Improve the understanding of the contribution of the Mary River Project to overall cumulative effects and environmental trends in the Qikiqtani region.** This could include: identification of knowledge gaps to help guide future research (by Government, proponents, industry, academia, Inuit organizations, communities, etc.) and identification of monitoring priorities focusing on the detection of/ understanding of cumulative effects in the Qikiqtani Region; information to support government decision making on future Mary River Project Certificate amendment applications; and, information to support decision making on projects other than the Mary River Project with the potential to contribute to cumulative effects.

Developing a shared understanding of what is meant by the term “cumulative effects” and other associated impact assessment terminology will be critical to realizing the goals outlined above. Additional priorities for the development of the CEAF include:

- Providing opportunities for community knowledge and Inuit Qaujimagatuqangit to inform and guide an updated CEA for the Mary River Project, including by using appropriate feedback mechanisms, such as through community consultations, periodic check-ins/verification of results, thematic technical meetings, and interim reporting;
- Improving public awareness and confidence in the monitoring outcomes and oversight for the approved Mary River project; and,
- Enhancing the awareness of how cumulative effects are considered within the unique legislative framework of Nunavut for resource development, project assessment and project monitoring.

To assist parties with planning for their participation in the development of the CEAF, the attached process map and anticipated timeline has been prepared for review; please note that the actual timing of public engagement sessions will require further verification by the NIRB prior to finalization and posting of the associated public notice. The NIRB expects to further update this document in consultation with the Steering Committee and will share further information and

guidance to support effective public participation as the process advances. Further, CIRNAC will be providing information in the near future around available Participant Funding to support engagement in the development of the CEAF.

The NIRB thanks everyone who has contributed to this initiative to date and appreciates parties remaining engaged in this process going forward. Should you have any questions regarding this initiative, please be encouraged to contact Amir Pourmahabadian, Senior Impact Assessment Officer at (867) 983-4612 or apourmahabadian@nirb.ca

Sincerely,



Tara Arko
Director, Operations
Nunavut Impact Review Board

Attached: CEAF Process Map and Anticipated Timeline (January 16, 2026)

cc: Megan Lord-Hoyle, Baffinland Iron Mines Corporation
Lou Kamermans, Baffinland Iron Mines Corporation
Teresa Lightfoot, Nunavut Tunngavik Incorporated
Jared Ottenhof, Qikiqtani Inuit Association
Assol Kubeisinova, Qikiqtani Inuit Association
Michele LeBlanc Havard, Government of Nunavut
Natalie D'Souza, Government of Nunavut
Spencer Dewar, Crown-Indigenous Relations and Northern Affairs Canada
Kim Pawley, Crown-Indigenous Relations and Northern Affairs Canada
Ryan Barry, Red Clay Environmental Solutions
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