



April 2, 2025

Lisa Dyer, Director General  
Northern Projects Management Office  
Yellowknife, Northwest Territories  
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**Re: Follow up re Federal Consultation Tour re Pending Applications for Activity Specific Authorizations for the Steensby Components**

Dear Lisa,

Baffinland appreciated the opportunity to attend the federal consultation tour (the **Tour**) that occurred from December 9-11, 2024 in Igloolik, Sanirajak and Pond Inlet and March 3-7, 2025 in Kimmirut, Kinngait, Igloolik, Arctic Bay and Clyde River to answer questions about the Mary River Project as directed by the Northern Projects Management Office (**NPMO**).

The focus of the Tour was on the issuance of the remaining activity specific authorizations required to proceed with the Steensby Port and Railway components of the Mary River Project (the **Steensby Component**). We understand NPMO is currently preparing a “What We Heard” Report. Following the first part of the federal consultation tour held in December 2024, Baffinland provided a follow-up letter on January 28, 2025 (Part A and Attachment 1). The enclosed correspondence intends to confirm which concerns were heard during the consultation tour held in March 2025, and how those concerns are addressed by Baffinland (Part B and Attachment 1). Baffinland is also sharing a Summary of Interests of Localities and Measures Undertaken to Address Interests, which was submitted to the Canadian Transportation Agency (CTA) as part of its Approval to Construct a Railway Application (Attachment 2). This summary provides a comprehensive description of how the interests of Inuit and other localities have been addressed.

***1. Additional Information re Topics Discussed During Tour***

A number of important topics were discussed by participants during the Tour. Baffinland has heard similar feedback during its direct consultations with the communities on the Mary River Project, including the Steensby Components, since engagement began in 2008, and more specifically during the federal consultation tour held in December 2024 and March 2025. Our more recent Steensby Component focused engagements have also included these discussion topics including discussions on how Baffinland has taken these topics into consideration through the NIRB approval of the Project and on-going operations. Baffinland strives to continuously incorporate community knowledge and advice in the Mary River Project, including how we operate. Baffinland also observed that participants asked some questions that were

general to the Mary River Project as it currently operates and not necessarily targeted at the Steensby Component.

The fact that a topic was raised by a participant during the Tour does not necessarily mean that the topic is outstanding or has not been addressed as part of the regulatory approvals that have already been issued for the Mary River Project (including in particular Project Certificate No. 005, the primary overall Project approval). It is likely, and understandable given the long operating history and high number of accommodation measures that have been developed to date, that many Tour participants are not aware of all of these measures that are already in place which were developed to help address community concerns and incorporate Inuit feedback into the Project. It is also understandable that these topics would be raised in discussions given that not all elements of the Steensby Components of the Project have been constructed and operated yet.

Further information on the following topics raised by participants during the March 2025 Tour are presented in Part B to this letter (this list is based on Baffinland’s notes). See Table 1 below for an overview of topics raised in each community.

**Table 1.** Topics Raised during the Federal Tour per Community

| Topic                               | Arctic Bay | Clyde River | Igloodik | Kimmirut | Kinngait | Pond Inlet | Sanirajak |
|-------------------------------------|------------|-------------|----------|----------|----------|------------|-----------|
| <b>Wildlife</b>                     |            |             |          |          |          |            |           |
| Marine Mammals                      | X          | X           | X        | X        | X        | X          | X         |
| Fish and Fisheries*                 | X          | X           | X        | X        |          | X          | X         |
| Caribou*                            | X          | X           | X        |          | X        | X          | X         |
| Birds                               |            |             |          |          | X        |            |           |
| <b>Project Activities</b>           |            |             |          |          |          |            |           |
| Crossing/Bridges*                   | X          | X           | X        |          |          |            | X         |
| Dust*                               | X          | X           | X        |          | X        | X          |           |
| Ballast Water and Invasive Species* | X          |             | X        |          |          |            | X         |
| Southern Shipping Route             | X          | X           | X        | X        |          |            |           |
| Geotechnical*                       |            |             | X        |          |          |            | X         |

| Topic   | Arctic Bay | Clyde River | Igloolik | Kimmirut | Kinngait | Pond Inlet | Sanirajak |
|---|------------|-------------|----------|----------|----------|------------|-----------|
| Railway Construction                                      |            |             | X        |          |          |            |           |
| <b>Project Monitoring</b>                                 |            |             |          |          |          |            |           |
| Inuit Involvement and Participation in Project Monitoring | X          | X           | X        | X        | X        | X          | X         |
| Baseline Studies  | X          |             | X        |          |          |            |           |
| QIA-Led Tusaqtavut Reports*                               |            |             | X        |          |          |            |           |
| <b>Effects On Communities and Individuals</b>             |            |             |          |          |          |            |           |
| Land Use  | X          | X           | X        |          |          |            |           |
| Mine Closure  |            | X           |          | X        |          |            |           |
| Access to Mary River Soapstone*                           |            |             |          |          |          |            | X         |
| Climate Change*   |            |             | X        |          |          |            |           |
| <b>Employment and Benefits</b>                            |            |             |          |          |          |            |           |
| Inuit Employment  |            | X           | X        | X        |          |            |           |
| Benefits for Communities*                                 |            |             | X        |          |          |            | X         |
| <b>Safety and Emergency Response</b>                      |            |             |          |          |          |            |           |
| Spill Response*   |            |             | X        |          | X        |            | X         |
| Accidents and Malfunctions                                |            |             |          | X        | X        |            |           |
| <b>Cultural and Archaeological Sites</b>                  |            |             |          |          |          |            |           |
| Archaeology/Cultural Sites*                               |            |             |          |          | X        | X          |           |

\*Indicates topics which were also raised during the December consultation tour and are discussed in the January 28, 2025 letter (see Part A).

## 2. Baffinland Consultation and Engagement Activities in Relation to Federal Authorizations

As referenced in the follow-up letter to the December consultation tour (Part A), Baffinland has also conducted its own extensive community engagement program in relation to the development of federal authorization applications. This program has been summarized and

presented in Annual NIRB Monitoring Reports as well as federal authorization applications as required under applicable legislation and/or guidelines. For ease of reference, the following table provides a summary of application sections and supporting documents for each authorization:

**Table 2. Engagement Summaries Included in Steensby Authorization Applications**

| Application  | Document Title   | Reference   |
|--|--|---|
| Marine Fisheries Act Authorization                                 | Community Engagement on Fisheries Offsetting – Steensby Component (Knight Piésold 2023)  | Appendix A-1  |
|  | Steensby Component Engagement – Q4 2023  | Appendix A-2  |
|  | Notification Letter to Coral Harbour – Update on Steensby Component  | Appendix A-5  |
|  | Invitation Letter to Hamlet of Kimmirut and Mayukalik HTA – Mary River Project Update Meeting  | Appendix A-6  |
|  | Invitation Letter to Hamlet of Kinngait and Aiviq HTO – Mary River Project Update Meeting  | Appendix A-7  |
|  | Notification Letters to Igloodik, Sanirajak, Arctic Bay, Kimmirut, Kinngait, Pond Inlet and Clyde River – Steensby Fisheries Offsetting Plans    | Appendix A-8  |
| Freshwater Fisheries Act Authorization                             | Community Fisheries Offsetting Report  | Appendix B1   |
|  | Community Letters of Engagement  | Appendix B2   |
| Application for Approval to Construct a Railway Line               | Canadian Transportation Agency Section 98 Application – Stakeholder Engagement Report  | Supporting Document (SD) 69   |
|  | Mary River Phase 2 Proposal Rail Alignment Summary Report  | SD 76   |
|  | Written notices to Igloodik and Sanirajak regarding the planned scope of activities for Steensby Rail and Steensby Port field studies, 2021-2023 | SD 77   |
|  | Community Risk Assessment Workshops – Final Report   | SD 78   |
|  | 2024 Steensby Elders Engagement  | SD 82   |
| Navigation Protection Program Applications – Freshwater and Marine | Steensby Community Engagement Report_Final with Appendices   | Steensby Community Engagement Report_Final with Appendices                                      |
|  | Community Engagement Report (Freshwater FAA Appendix B1)   | Community Engagement Report (Freshwater FAA Appendix B1)  |
|  | Land Use Report (FEIS 03-Appendix 4C)  | Land Use Report (FEIS 03-Appendix 4C)   |
|  | Summary of Community-based Research Undertaken for the Mary River Project (FEIS 04-Appendix 2B)  | Summary of Community-based Research Undertaken for the Mary River Project (FEIS 04-Appendix 2B) |

**3. Next Steps Under Project Certificate re Steensby Component Management Plans**

As shared by NPMO during the Tour and in the January 28, 2025 letter, the Mary River Project was approved by the Nunavut Impact Review Board (NIRB) in 2012, and Baffinland has already

been granted a number of government approvals which include the Steensby Component. Project Certificate No. 005 reflects the outcome of a deep consultation process, including public hearings held in Igloolik, Iqaluit and Pond Inlet that were attended by over 150 people and included representatives from Nunavut communities impacted by the Mary River Project. The NIRB process included incorporation of feedback from a dedicated Inuit working group led by QIA. This process led to comprehensive Project Certificate Terms and Conditions that directly incorporated community views and preferences on the Project Design, as well as commitments that are incorporated in the Project Certificate.

There are comprehensive annual monitoring programs already in place that the NIRB oversees under the Project Certificate and NuPPAA, in addition to working groups which include participants from each of the impacted communities, and provide meaningful feedback into the Project's mitigation and monitoring programs on an ongoing basis.

There is also the Mary River Project Inuit Impact Benefit Agreement (**IIBA**) in place between Baffinland and QIA (per Article 26 of the Nunavut Agreement), which ensures the project provides benefits to Inuit and included additional measures to help limit negative impacts.

Baffinland heard that some Tour participants may be interested in actively participating in the process for developing the final plans that are required for the Steensby Components under the Project Certificate. Baffinland has been working with communities on the Steensby Components and intends to continue to incorporate Inuit feedback from our work together as we develop the Steensby management plans. We are working closely with QIA to implement this mechanism. Furthermore, Baffinland has several existing processes to integrate Inuit feedback, including environmental working groups, the Annual Project Review Forum (**APRF**) and ongoing community engagement conducted by Baffinland's Inuit engagement team. This process to obtain Inuit input is conducted as intended by the NIRB approval. Management plans will also reflect the outcome of any activity-specific authorizations, permits and approvals received for the Steensby Component. Baffinland will implement mitigations and monitoring programs that are developed, in addition to the adaptive management systems that are intended to address Inuit feedback and unanticipated effects, should they occur.

We hope this information is helpful to NPMO as you proceed with finalization of the "What We Heard Report". Baffinland would be pleased to provide further information in relation to these and any other topics of interest to NPMO as needed.

Regards,



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Cc:

- Melissa Alexander, Senior Project Manager, NPMO
- Thomas Hoggart, Regional Director of Aquatic Ecosystems
- José Audet Lecouffe, Team Lead, Department of Fisheries and Oceans
- Paul Harper, Senior Biologist, Department of Fisheries and Oceans
- Gregory Black, Navigable Waters Protection Officer, Transport Canada
- Jemma Harrison, Regional Manager, Navigation Protection Program, Transport Canada
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- Assol Kubeisnova, Manager, Regulatory Review, QIA
- Luc Chamberland, Director, Rail and Marine Determinations Directorate, Canadian Transportation Agency
- Jason Tsang, Senior Manager, Engineering Advisory Services & Rail/Marine Determinations, Canadian Transportation Agency
- Tracey McCaie, Manager Lands Administration, CIRNAC

Encl.

- ***Part A. Follow up re Federal Consultation Tour re Pending Applications for Activity Specific Authorizations for the Steensby Components - January 28, 2025***
- ***Part B. Follow up re Federal Consultation Tour re Pending Applications for Activity Specific Authorizations for the Steensby Components – April 2, 2025***
- ***Attachment 1. Relevant Terms, Conditions and Commitments for Topics Raised during the Federal Tour***
- ***Attachment 2. Summary of Interests of Localities and Measures Undertaken to Address Interests***