2026 Spring Site Visit Report

MARY RIVER PROJECT

File No. 08MN053
Project Certificate 005

Abstract

Site visit report of the Mary River Project for the 2025-2026 reporting year
Project Location: Qikiqtani Region, Nunavut
Proponent: Baffinland Iron Mines Corporation (Baffinland)
Monitoring Period: October 2025 – September 2026
Site Visit Dates: April 30 – May 2, 2026
Visit conducted by: Varun Nayak, Monitoring Officer; and
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Date Issued: June 15, 2026

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1. INTRODUCTION

The Nunavut Impact Review Board (NIRB or Board), established under Articles 10 and 12 of the *Nunavut Agreement* and s. 135(4) of the *Nunavut Planning and Project Assessment Act (NuPPAA)*, oversees post-environmental assessment monitoring. The NIRB also provides periodic updates regarding its monitoring program to the most impacted community(ies) regarding the monitored project. This report summarizes observations from NIRB's site visit to the Mary River Project, conducted during April 30 – May 2, 2026, under Project Certificate No. 005, Amendment 05. The visit aimed to visually assess project activities for compliance with the Certificate's Terms and Conditions, as required by Section 12.7.2(b) of the *Nunavut Agreement* and s. 135(3)(b) of *NuPPAA*. Observations made during the site visit will inform NIRB's 2025 Annual Monitoring Report.

2. PROJECT OVERVIEW

Figure 2-1: Project Location (Source: Baffinland's 2024 Annual Report)

The Mary River Project is located approximately 150km southwest of Pond Inlet on Northern Baffin Island (Figure 2-1). The Mary River Project currently operates across four (4) main components: the Mary River Mine Site, the 100-km Tote Road, the Milne Port facility, and the Northern Shipping Route. Collectively, the areas north of the Mine Site are referred to as the Northern Transportation Corridor. Current operations include open-pit mining at Deposit No. 1, ore crushing, transportation of ore from the Mine Site to Milne Port via the Tote Road, loading of ore at Milne Port, and seasonal shipping through Milne Inlet and Eclipse Sound between July and October.

The Project also includes the proposed Steensby component, consisting of an approximately 150-km railway connecting the Mine Site to Steensby Port, a new port facility at Steensby Inlet, and year-round shipping along the Southern Shipping Route through Foxe Basin and Hudson Strait. This infrastructure has not yet been constructed and remains in the pre-construction phase.

3. OBSERVATIONS AT SITE

From April 30 to May 2, 2026, NIRB staff conducted a spring site visit to Baffinland Iron Mines Corporation's Mary River Project, including the Mine Site, Tote Road, and Milne Port, accompanied by Baffinland environmental staff. The visit focused on observing site activities, environmental management practices, and implementation of Project Certificate requirements. During the visit, NIRB staff observed ongoing operational activities and held discussions with the Proponent regarding environmental monitoring, mitigation measures, and adherence to Project Certificate requirements (Table 1).

Due to seasonal conditions, water bodies and water management infrastructure remained largely frozen and snow covered, limiting assessment. These features will be further evaluated later in the year under snow-free conditions.

Table 3-1: Observations linked to Terms and Conditions

T&C No.	Topic / summary	Site Observation
5	Weather available to public	Information is made available around site as well as online. Baffinland has several weather stations installed on site.
10	Dust management and monitoring	Dustfall monitoring stations were observed along the airstrip at the Mine Site and along the Tote Road (Photo 55), including near water bodies. Active air monitors were installed at multiple locations, including the crusher, to collect real-time data. Dust mitigation measures included liquid suppressant applied along the crusher conveyor and mechanical controls such as enclosures and reduced drop heights (Photo 15, Photo 17, and Photo 18). Snow-covered conditions allowed visual assessment of dust deposition. Dust was observed on snow adjacent to the Tote Road within a limited distance, while snow at greater distances appeared free of visible dust (Photo 48, Photo 49, and Photo 65). Haul trucks were observed in operation with no visible dust emissions from ore loads; however, dust generation from tire-road interaction was noted (Photo 50).

		Ore stockpiles at Milne Port are identified as a source of dust emissions during stacking activities and due to wind erosion (Photo 82 and Photo 83). Baffinland applies dust suppressants to these stockpiles to manage dust generation.
11 and 64	Incineration management and Terrestrial Wildlife and Habitat - Waste Management	Incinerator buildings at both the Mine Site and Milne Port were well managed, with materials clearly labeled and stored in an organized manner. At the Milne Port, HAZMAT storage was secured within locked seacans (Photo 91). However, domestic waste dumpsters adjacent to the incinerator building were fitted with mesh-style lids, and a raven was observed accessing waste through these openings (Photo 92). At the Mine Site, while the incinerator building itself was well maintained, multiple seacans containing hazardous or potentially hazardous materials were observed with missing or partially open doors, including instances of snow accumulation within containers (Photo 25 and Photo 29). Wildlife tracks were observed in the vicinity (Photo 24, Photo 28, and Photo 29). Additional tracks were observed within the hazardous waste berm east of the incinerator, where some seacans were not fully secured, and within landfarm cells adjacent to the landfill area (Photo 35, Photo 36, and Photo 37).
17 (related to 24 and 46)	Prevent impacts to water bodies from effluent	Observed the KM 105 Dam, Settling Pond, and Effluent Testing Station, which are designed to manage effluent from the Mine Haul Road and Deposit 1.
19	Mitigate impacts to natural water flow	Several culverts and ditches were observed along the Tote Road, with riprap in place to enhance channel stability and regulate surface water flow during freshet conditions. In addition, ditches along the Haul Road were being cleared of snow to improve drainage capacity in preparation for the freshet.

26 (related to 22 and 43)	Erosion and sedimentation management	Riprap and silt fences were observed; however, they were largely covered by snow. These features will be assessed later in the year during the next NIRB site visit (summer–fall).
28	Permafrost monitoring	Geothermal monitoring stations (e.g., thermistor installations) were observed at multiple locations across the site (Photo 66).
52 (related to 50, 53 and 54)	Deterring caribou from pits and other hazardous areas	No caribou deterrents were observed around the site or the Deposit. A group of six caribou was noted near KM 90 of the Tote Road, with individuals observed on both sides of the road over two days (Photo 74, Photo 75, Photo 76, Photo 77, and Photo 78). NIRB staff noted that the Caribou Decision Tree, as outlined in the Terrestrial Environment Mitigation and Monitoring Plan, was actively being implemented. Road safety personnel were present on site, and dispatch communications were actively used to notify drivers of caribou presence and movement in the area.
57	Wildlife reporting-incidentals	Wildlife observation logs were available at multiple locations for recording entries (Photo 45).
143	Employee family contacts	Communication facilities were observed in site accommodations, with phones available in individual rooms and internet access provided for all personnel.
165	Emergency Shelter	Emergency shelters were observed along the Tote Road (Photo 58, Photo 59, and Photo 60).

KM 80 By-Pass Road and Culvert Replacement (2026 Update)

As noted in the 2025 NIRB site visit report (NIRB File No. 357398), concerns were identified at the KM 80 culvert crossing where high-water levels prevented observation of the culvert interior. The road surface above the culverts was observed to be soft and spongy, with water and air forced to the surface under pressure, indicating a potential void beneath the road. Following the site visit, it was confirmed that the culverts had collapsed beneath the road. Additional details and supporting information are provided in the CV-216 By-Pass Culvert Crossing Design Brief, Appendix A, submitted to the Nunavut Water Board (NIRB File No. 357441).

In response, Baffinland constructed a by-pass road and installed three new culverts under an Emergency Fisheries Act Authorization issued by Fisheries and Oceans Canada. At the time of the 2026 site visit, the by-pass road and new culvert installation were complete (Photo 69, Photo 70, Photo 71, and Photo 72). Concrete jersey barriers placed along the shoulder crest appear to be insufficiently supported on the sloped surface, creating a potential instability concern (Photo 72).

Photo 1: Culvert Inlet at KM80, hydraulic fluid spill observed (Source: 2025 NIRB Site Visit Report)

3.1. Mine Site

At the Mine Site, NIRB staff visited key operational and infrastructure areas, including fuel tank farms, waste rock storage facilities, the KM 105 dam, waste management facilities, maintenance and laydown areas, the crusher plant, and Deposit No. 1. Monitoring infrastructure, including air quality and weather stations, was also observed. Preparations for spring freshet, including snow and drainage management along the Haul Road, were underway. The Figure 3-1 illustrates the overall layout of the mine site.

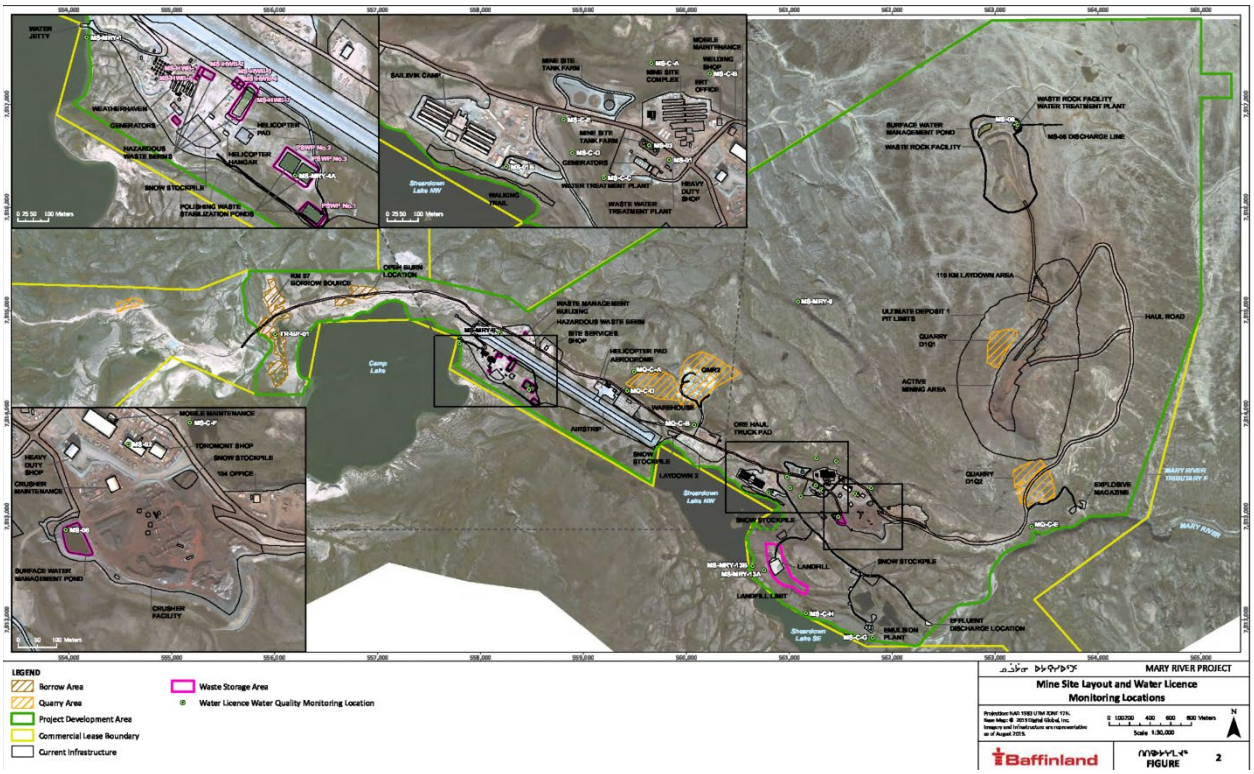

Figure 3-1: Mine Site Layout (Source: Baffinland's Waste Management Plan Rev. 8)

3.1.1. Deposit No. 1[1]

Photo 2: General overview Deposit No.1 looking northwest from Haul Road

Photo 3: A blast hole drill rig north of the active mining area

[1] Deposit No. 1 is the main open-pit iron ore deposit at the Mary River Mine and serves as the primary source of high-grade ore for current operations. Due to snow cover, cloud conditions, and ongoing operations, a clear overview of the pit and active mining area was not obtained.

Photo 4: Seacans at KM 110.5 Laydown, north of Deposit No.1

Photo 5: Communication tower, northeast of Deposit No.1

3.1.2. KM 105 Dam and Water Treatment Facility[2]

Photo 6: General overview of KM 105 Dam facing East

Photo 7: KM 105 Dam pumping station

[2] At the Mary River Mine, the KM105 dam/pond is part of the site's water management system, used to collect and treat contact water before release, allowing sediment to settle and protecting water quality.

Photo 8: Downstream area of KM105 Dam where water is tested for TSS, facing North

Photo 9: KM 104 Laydown, located west of KM 105 Dam

3.1.3. Haul Road[3]

Photo 10: Haul Road, facing west at KM 105

Photo 11: Haul truck transporting waste rock to Waste Rock Facility

[3] The haul road is used by large haul trucks to transport ore, waste rock, and materials between the pit, crushers, stockpiles, processing areas, and supporting infrastructure. Snow clearing from ditches and active snow management along the road were observed as part of freshet preparedness activities.

Photo 12: Active snow management along the Haul Road

3.1.4. Effluent Discharge Location

Photo 13: Effluent Discharge Location, facing east (snow-covered, no active discharge observed)

3.1.5. Crusher Facility[4]

Photo 14: General overview of Crushers A, B, and C, facing south

Photo 15: Ore stockpiles, with a front-end loader loading ore into haul trucks for transport

[4] The crusher facility consists of three (3) units (Crushers A, B, and C) used for primary ore size reduction, with conveyors transferring material to the adjacent stockpile area for temporary storage. Dust control measures, including dust suppressant application, skirting at conveyor outlets, and the use of shrouds, were observed throughout the crusher facility.

Photo 16: Accumulation of fine ore dust beneath crusher A conveyors, likely due to vibration-induced spillage

Photo 17: Liquid dust suppressant stored in a heated seacan

Photo 18: Crusher B outlet showing discharge of coarse, lump ore with no visible dust

Photo 19: Crusher Maintenance and parts storage seacans

Photo 20: Work area within the Crusher Maintenance facility

Photo 21: Gas storage area located outside the maintenance facility

3.1.6. Fuel Tank Farms[5]

Photo 22: Mine site tank farm (MS-03)

Photo 23: Chain link fence and secondary containment around Fuel tank farm (MS-03B)

[5] Two (2) tank farms are located at the mine site: one with four (4) tanks and another with a single tank. All tanks were contained within secondary containment areas, and spill kits were available nearby.

3.1.7. Waste Management Buildings

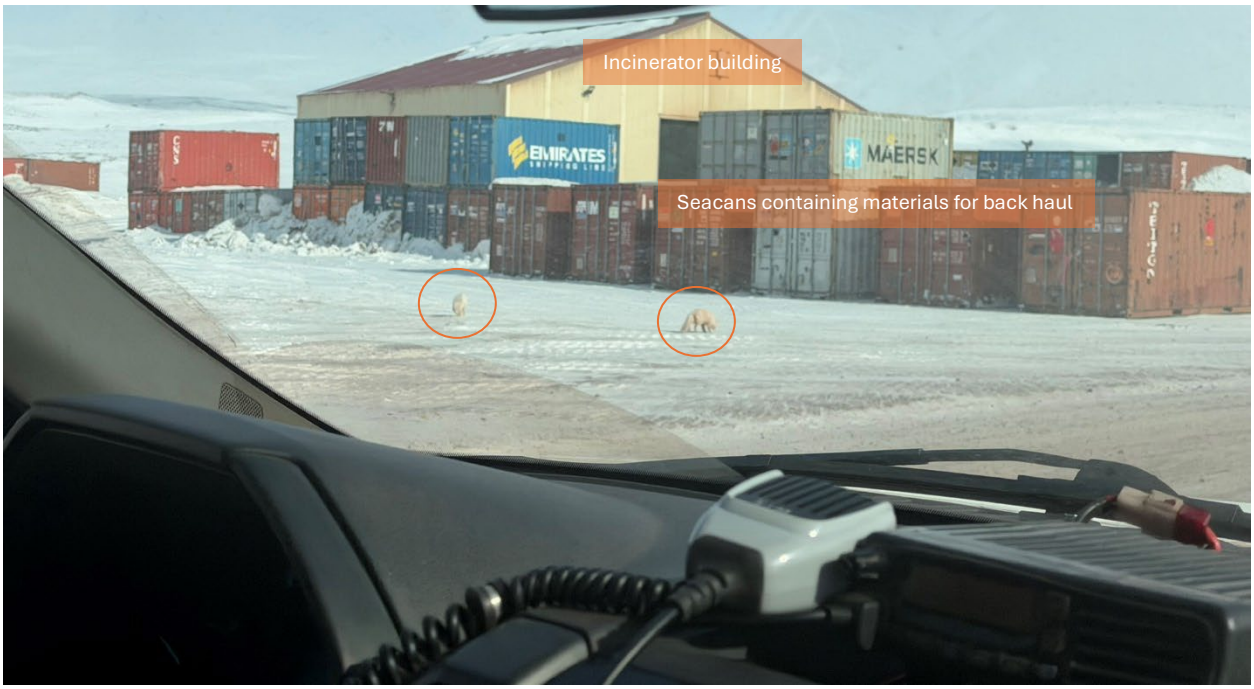

Photo 24: Presence of Arctic foxes in the vicinity of the incinerator building

Photo 25: Unsecured seacans in front of the incinerator building

Photo 26: Incinerator building interior: well organized, with spill kits readily accessible

Photo 27: Incinerator building interior: well organized, with spill kits readily accessible

Photo 28: Hazardous waste berm with visible wildlife snow tracks; unsecured sea cans in background

Photo 29: Seacans adjacent to hazardous waste berm, some unsecured, with human and wildlife tracks present

Photo 30: Seacans south of the incinerator building, with multiple units unsecured

Photo 31: Arctic fox observed near seacans south of the hazardous waste berm

Photo 32: Arctic fox observed near the site services shop east of the incinerator building

Photo 33: Vehicle and equipment laydown at site services shop, with spill trays observed

3.1.8. Landfill and Landfarm[6]

Photo 34: Fenced landfill with gated access

Photo 35: Landfarm cells with visible wildlife snow tracks

[6] The landfill is used for the disposal of inert solid waste, and the landfarm is a designated facility for the treatment and management of hydrocarbon-contaminated soils; wildlife snow tracks were observed, indicating potential wildlife use.

Photo 36: Landfarm cells with visible wildlife snow tracks

Photo 37: Seacans adjacent to landfill area, with snow tracks observed

3.1.9. Warehouse

Photo 38: Warehouse building

Photo 39: Seacans in warehouse area, with multiple units partially open

Photo 40: Additional seacans in warehouse area, with multiple units open

Photo 41: Fuel tanks within secondary containment at the helicopter pad (west of warehouse area); spill kits present

3.1.10. Camp Lake

Photo 42: Camp Lake and water intake pumphouse, facing west

Photo 43: Pumphouse interior showing water intake system with results transmitted directly

3.1.11. Camps and Related Facilities

Photo 44: Distant view of the Sailivik Camp

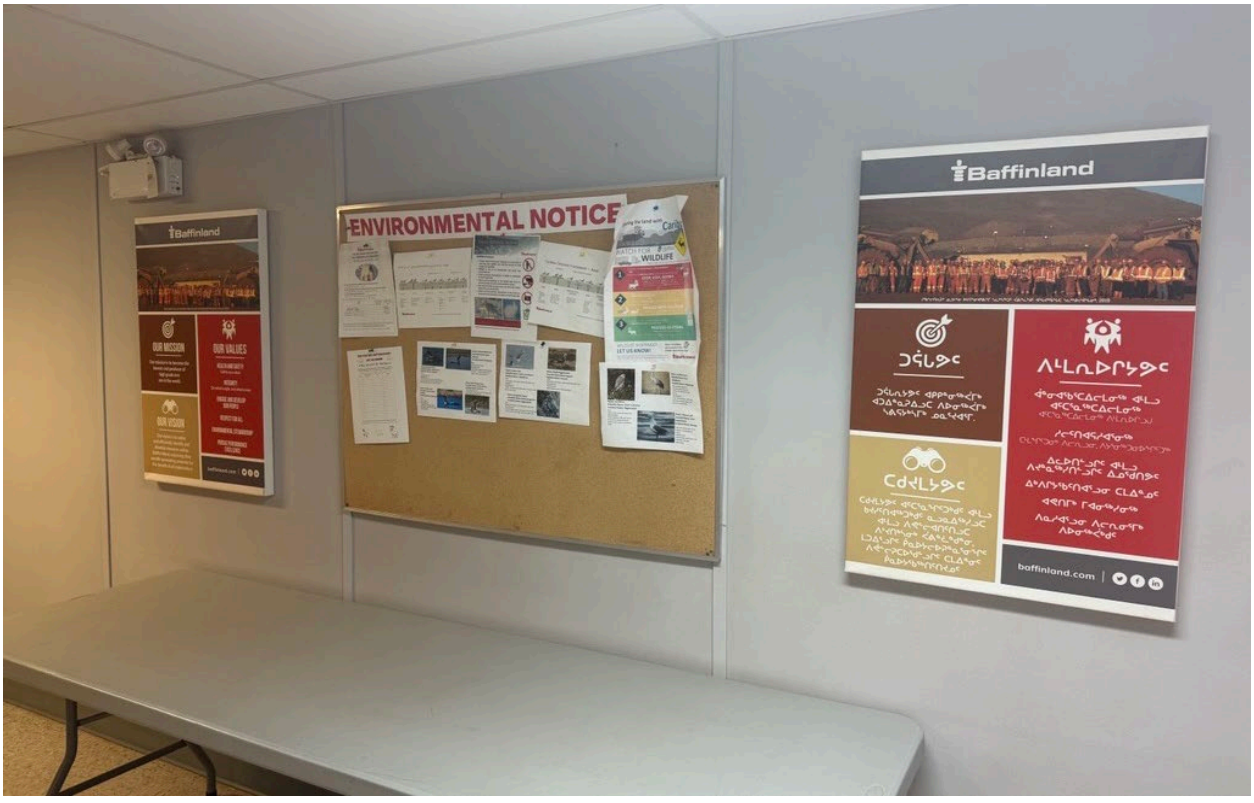

Photo 45: Environmental notice board outside the cafeteria, including an incidental wildlife reporting log

Photo 46: Country Kitchen located at Sailivik Camp, with an IIBA bulletin board displayed

Photo 47: Indoor games area at Sailivik Camp

3.2. Tote Road

The Tote Road was travelled between the Mine Site and Milne Port. During the site visit, NIRB staff observed key areas along the Tote Road, including dustfall monitoring stations, snowbank management areas, bridge and culvert repairs, signage, borrow sources (e.g., KM 97), and emergency shelters. Snow track surveys were also noted along the road. Assessment of some infrastructure, particularly culverts, was limited due to frozen and snow-covered conditions; these features will be further evaluated under snow-free conditions later in the year. Active snowbank management was observed, and culvert clearing was noted to be planned in the coming weeks.

Photo 48: Overview of the Tote Road (southbound) with ore haul truck; localized dust deposition observed on adjacent snow surfaces, diminishing with increasing distance from the road

Photo 49: At KM 4, west-facing view from the Tote Road, showing decreasing dust deposition

Photo 50: Ore haul truck transporting ore to Milne Port, with fugitive dust generation from tire-road interaction

Photo 51: Distant view of snowmachine crossing located at approx. KM13, highlighting the height of the snow windrows obstructing trail access

Photo 52: Close-up view of the crossing signage and adjacent steep, uneven berms blocking safe entry

Photo 53: Bridge crossing at KM 17 over Phillips Creek, with wildlife snow tracks observed[7]

Photo 54: Ore haul truck stopped at bridge prior to crossing

[7] Stop and reduced speed controls were observed at bridge crossings to minimize dynamic loading and vibration, thereby reducing potential structural stress and preserving underlying permafrost integrity.

Photo 55: One of the dustfall collectors installed along the Tote Road

Photo 56: Fish passage culverts at KM 33, north-facing view

Photo 57: Designated fuel storage area with spill kit accessible nearby

Photo 58: Emergency shelter seacan located along the Tote Road

Photo 59: Interior of emergency shelter

Photo 60: Interior of emergency shelter

Photo 61: Active snowbank management along the Tote Road

Photo 62: Fish passage culverts at KM 51

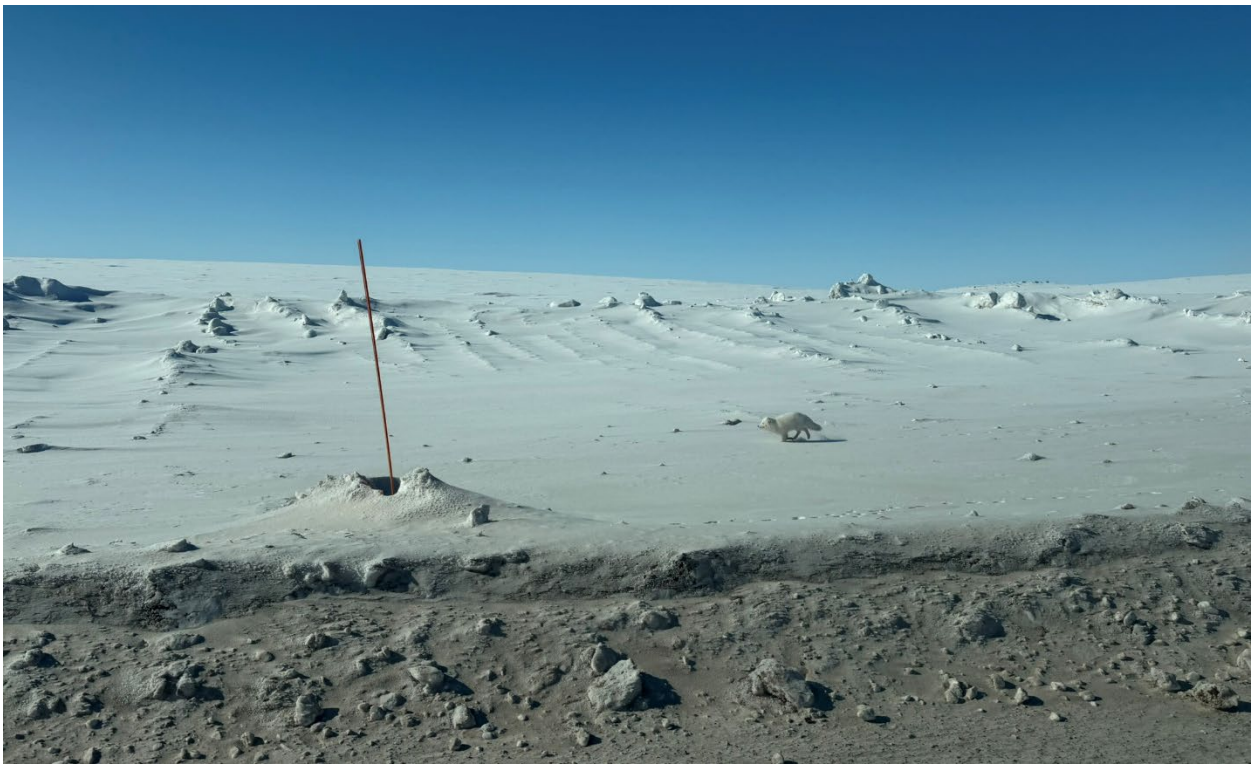

Photo 63: One (1) of two (2) Arctic foxes observed at KM 70

Photo 64: Second Arctic fox observed at KM 70

Photo 65: Dust conditions at KM 70, showing localized deposition

Photo 66: Bridge crossing at KM 80, with wildlife snow tracks observed

Photo 67: Unsecured seacan units adjacent to the KM 80 bridge, with wildlife tracks observed entering the unit, indicating use by wildlife and presenting potential hazards to both wildlife and personnel

Photo 68: Interior of unsecured seacan units at KM 80 crossing, containing debris, equipment, signage, spill kits, and fuel containers

Photo 69: Newly constructed by-pass Road at KM 80 following culvert collapse in 2025

Photo 70: Newly installed three (3) culverts at KM 80

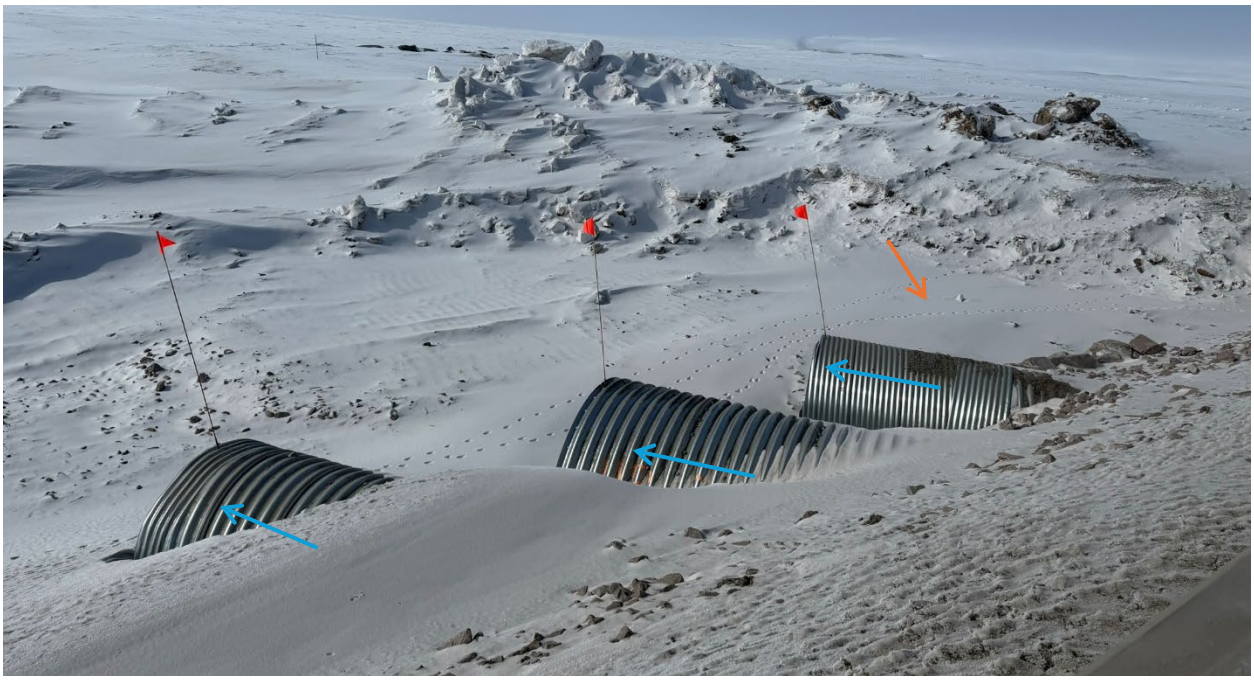

Photo 71: Newly installed three (3) culverts at KM 80

Photo 72: Concrete jersey barriers installed along both shoulders of the new by-pass road[8]

[8] Unstable placement of concrete jersey barriers observed on the shoulder crest. Due to inadequate seating on the slope, there is a risk of downslope toppling. Failure threatens to crush or block the underlying culvert, resulting in seasonal meltwater pooling, slope erosion, and roadway washout. Stabilization or barrier setback could be required.

Photo 73: Arctic fox observed near seacans at the by-pass road at KM 80

Photo 74: Three (3) caribou observed at KM 95 of the Tote Road, facing northeast. Part of a group of six (6) with three (3) located on the other side of the road and not visible from the road

Photo 75: Close-up view of caribou observed at KM 95 of the Tote Road, facing northeast

Photo 76: Caribou at KM 95, momentarily alert to an ore hauling truck before resuming normal behaviour without signs of stress

Photo 77: Three (3) caribou, observed resting at KM 98 of the Tote Road (~ 150-200 meters away from the road) one day prior to the sighting documented above, facing northwest; likely the same group

Photo 78: Zoomed-in view of caribou at KM 98 (~ 150-200 meters away from the road), facing northwest

3.3. Milne Port

At Milne Port, NIRB staff visited operational and storage areas, including the ore dock and stockpile, fuel storage, hazardous materials areas, maintenance shops, laydown areas, quarries, the landfarm, and waste management facilities. Spill response equipment and containment measures were observed at key locations.

Figure 3-2: Milne Port Site Layout (Source: Baffinland's 2025 NWB QIA Annual Report)

3.3.1. Ore Dock and Stockpile Area

Photo 79: Milne Port ore dock showing two (2) ship loaders: one (1) currently operational, with a second unit under construction, facing north

Photo 80: Closure view beneath the Milne Port ore dock ship loaders, capturing the scale of the operational unit alongside the structure under construction from ground level

Photo 81: Base of the ore dock structure with sea ice conditions visible in the background

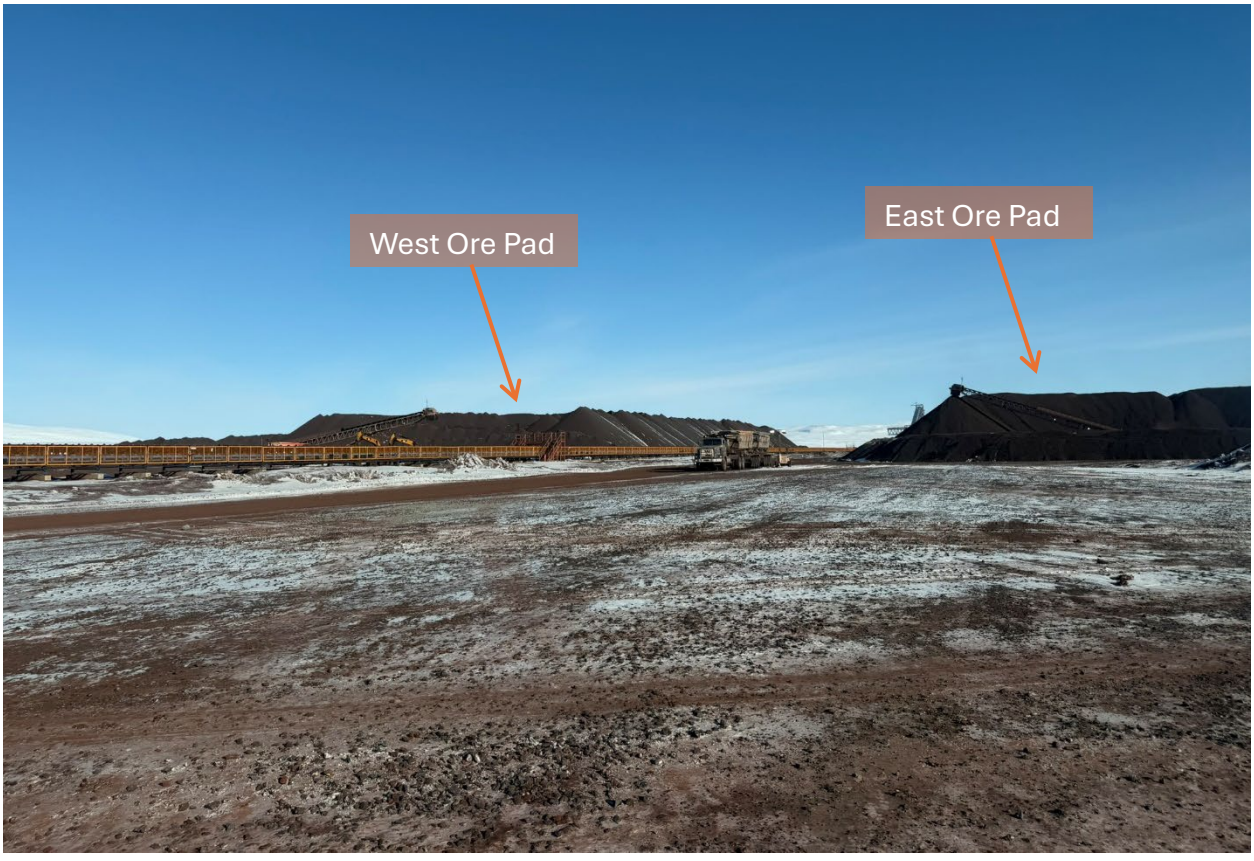

Photo 82: Distant view of Ore Pad

Photo 83: Ore stockpile looking west

Photo 84: Close-up view of the ore stockpile, highlighting texture and particle size variation

Photo 85: Ore stockpile sedimentation pond (North), frozen and snow covered, used for runoff treatment from the ore stockpile

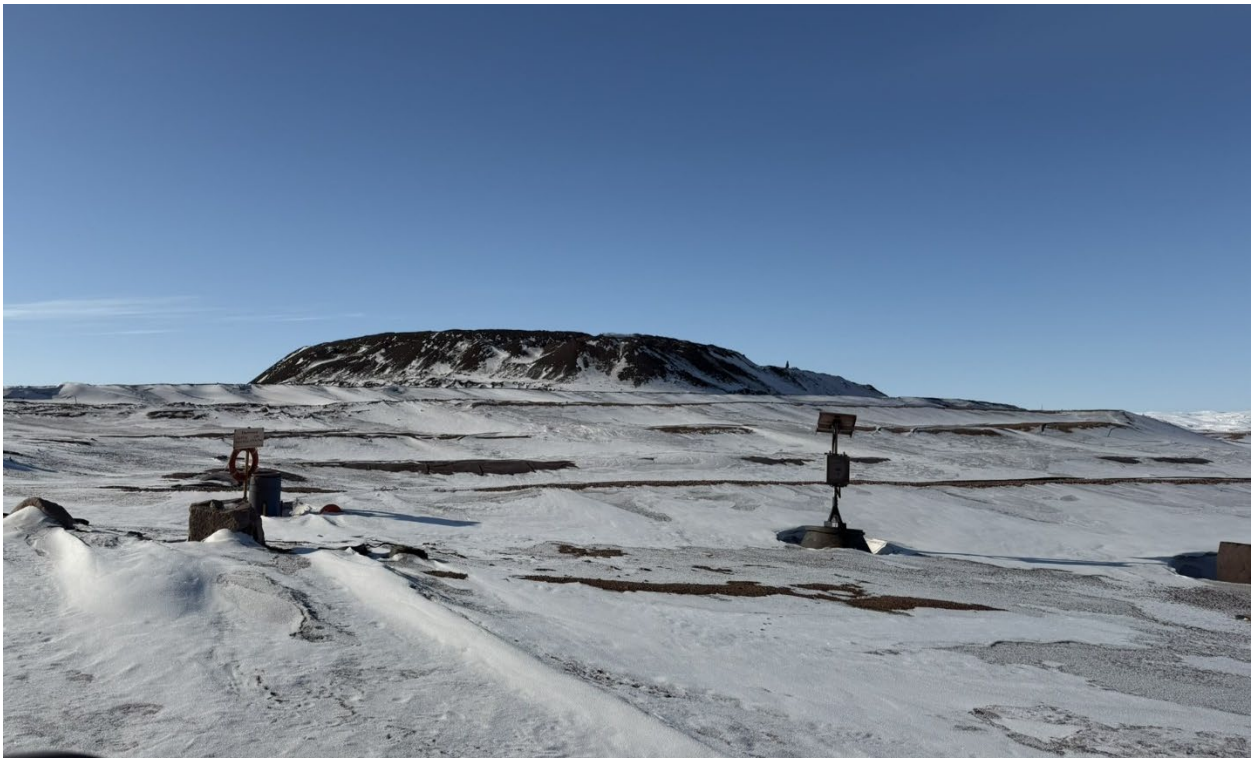

Photo 86: Ore stockpile sedimentation pond (East), frozen and snow covered, used for runoff treatment from the ore stockpile

3.3.2. Freight Dock and Barge Landing Area

Photo 87: Freight dock and barge landing area facing north, snow covered and frozen with limited access, and sea ice visible in the background

Photo 88: HTO cabin at Milne Port, looking west from the barge landing area laydown

3.3.3. Waste Management Buildings and Hazardous Waste Berm

Photo 89: Hazardous Waste Berm located northeast of fuel tank farm

Photo 90: Incinerator building

Photo 91: Secured HAZMAT storage units in front of incinerator building

Photo 92: Domestic waste dumpsters adjacent to the incinerator building with mesh-style lids; a raven accessing waste through the openings

Photo 93: Interior of the incinerator building, well organized with ongoing cleaning activities and spill kits readily available

Photo 94: Hazardous Waste Berm located northeast of fuel tank farm

3.3.4. Landfarm cells

Photo 95: Contaminated Snow Disposal Cell (MP-04A)

Photo 96: Landfarm (MP-04)

3.3.5. Fuel Tank Farm

Photo 97: Fuel tanks at the fuel tank farm within secondary containment and perimeter fencing

Photo 98: Vehicle fuel module and spill kits

3.3.6. Laydown Areas

Photo 99: Laydown area east of landfarm cells, general view from the landfarm access road

Photo 100: Laydown area adjacent to barge landing area

Photo 101: Phase 2 laydown area

Photo 102: Laydown Pad 6

3.3.7. Camps and Related Facilities

Photo 103: Milne Port Site Complex entrance

Photo 104: Waste segregation bins and an information board on health and nutrition in hallway

Photo 105: Emergency Response and Industrial Hygiene information board located in hallway

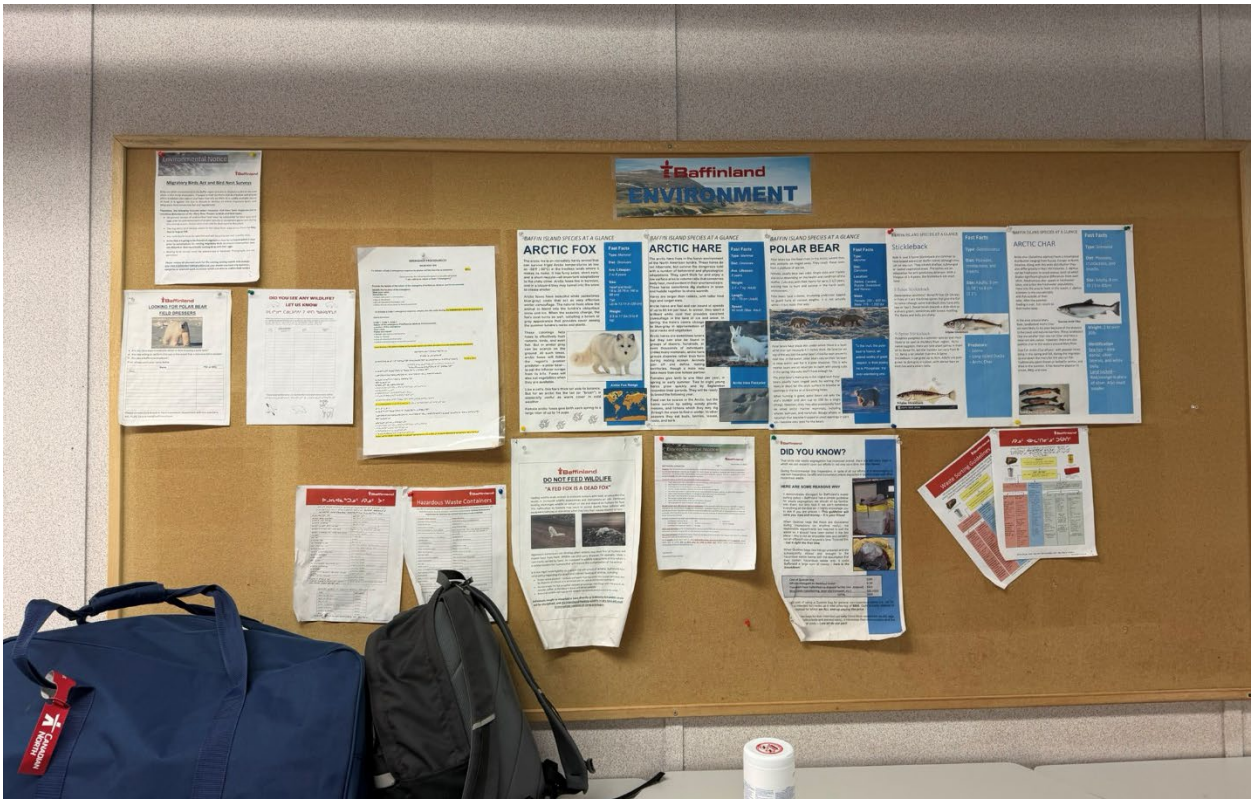

Photo 106: Environmental information board located in hallway

4. CONCLUSION

During the Spring 2026 site visit, NIRB and Baffinland staff discussed ongoing operations of the Mary River Project under Project Certificate No. 005, Amendment No. 5. Overall, site infrastructure and operations appeared generally well maintained, and key environmental management systems, including incineration facilities, monitoring programs, and spill response provisions, were observed to be in place and functioning as intended in many areas.

Notwithstanding these observations, several deficiencies related to waste management practices and associated wildlife interactions were identified across the Mine Site and along the Tote Road. In particular, the management and condition of seacans used for storing hazardous and non-hazardous materials require improvement. Multiple seacans were observed to be unsecured, partially open, or otherwise accessible, with evidence of wildlife use, including tracks entering and within containers.

Wildlife presence in and around waste management areas including the incinerator complex, hazardous waste berm, landfill, and landfarm cells suggests that current containment and deterrence measures are not fully effective. These conditions create potential pathways for wildlife attraction, ingestion, contamination exposure, and habituation, which are inconsistent with the intent of applicable Project Certificate requirements related to waste management and terrestrial wildlife protection.

Along the Tote Road, similar concerns were noted at the KM 80 crossing and by-pass road, where unsecured seacans and observed wildlife activity indicate continued access to materials. In addition, concrete jersey barriers installed as part of the recent culvert replacement works were observed to be insufficiently supported on sloped surfaces, creating a potential risk of instability, particularly during spring melt and high-flow conditions.

Dust monitoring and mitigation measures were observed to be implemented across the Project, and emissions from ore loads appeared generally controlled; however, localized dust deposition adjacent to the Tote Road and dust generation associated with vehicle movement remain ongoing and should continue to be monitored and managed.

Overall, while the Project demonstrates a general level of compliance with environmental management requirements, the observations outlined above highlight the need for strengthened implementation of waste containment, wildlife deterrence, and infrastructure stabilization measures to reduce environmental risk and improve alignment with Project Certificate conditions.

NIRB staff identified the following specific areas for improvement:

1. **Seacan Management and Waste Containment**
   Ensure seacans are fully closed, secured and maintained in good condition. Implement routine inspections and remove unused units where feasible.
2. **Wildlife Access to Waste Management Areas**
   Strengthen containment and deterrence measures at the incinerator area, hazardous waste berm, landfill, and landfarm. Eliminate access pathways and monitor wildlife activity.
3. **KM 80 By-Pass Road**
   Assess and stabilize concrete jersey barriers along the by-pass Road if needed. Ensure proper placement to reduce the risk of movement, culvert blockage, or road damage.
4. **Dust Along Tote Road**
   Continue monitoring dust and apply additional controls where localized dust persists.

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