



September 20, 2024

Keith Morrison
Nunavut Impact Review Board
29 Mitik Street, PO Box 1360
Cambridge Bay, NU X0B 0C0
Email: kmorrison@nirb.ca
info@nirb.ca

Subject: QIA Information Requests for Baffinland Iron Mines Corporation’s Sustaining Operations 2 Proposal

Dear Keith Morrison,

The Qikiqtani Inuit Association (QIA) is pleased to submit its Information Requests (IRs) on Sustaining Operations Proposal 2 (SOP2) filed by Baffinland Iron Mines Corporation (Baffinland or the Proponent) to the Nunavut Impact Review Board (the NIRB or the Board) as requested by the Board in the correspondence dated August 19, 2024. The Information Requests are included in Appendix A of this correspondence.

In addition, QIA would like to direct the NIRB’s attention to several procedural matters related to Sustaining Operations Proposal 2 (“SOP2”) and arising out of the Process Map shared by NIRB on August 30, 2024. QIA’s priority with respect to the NIRB’s reconsideration process is to ensure that the process allows for adequate time and opportunity for Inuit to be heard. As the Board is aware, QIA has been consistent in this position over the last several regulatory processes for the Mary River Project (the Project), and it continues to be the most important consideration.

Final Submissions

As the Regional Inuit Association for the Qikiqtani Region and a Designated Inuit Organization under the *Nunavut Agreement*, QIA has a duty to ensure that it is representing Inuit in the Qikiqtani region in this process and to make sure that their issues and concerns are given meaningful consideration, by the NIRB itself, but also by QIA through QIA’s own participation.



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In QIA’s May 23, 2024 comment letter¹ on SOP2 process, QIA emphasized why final written submissions are essential: “(t)hese final, non-technical submissions are critical to QIA’s ability to fulfill its role as a Designated Inuit Organization with the responsibility for ensuring the evidence from impacted communities is adequately addressed by regulatory decisions and by federal approvals impacting Inuit rights.” In reviewing the draft process map, it is apparent that this step was not considered for the SOP2 review process.

While QIA understands that the NIRB did not allow final written submissions in the recent expedited regulatory processes for the Project, SOP2 requires a fulsome reconsideration, which is in line with the vision of this process as expressed in the NIRB’s correspondences. Therefore, to ensure a careful consideration is given to the views of the impacted communities, and QIA has an opportunity to engage its Board of Directors, QIA urges the NIRB to dedicate a formal stage of the process to the filing of these final written submissions. QIA believes there is sufficient time to allow for a brief window following the conclusion of the public hearing for filing final written submissions. Having the ability to present the totality of evidence and perspectives heard in the public hearing and community roundtable is critical in respecting Inuit governance structures afforded by the *Nunavut Agreement*.

Allowing final written submissions is an important requirement to ensure that the regulatory process is meaningful, contributes to satisfying the Crown’s duty of deep and meaningful consultation, and provides an opportunity for QIA to exercise its rights regarding governance to make an informed decision on whether to support the proposal. While the final decision on SOP2 will be made by the Minister, and they will have the constitutional responsibility to ensure that the Duty to Consult and Accommodate Inuit (the Duty) was met, the Minister has typically relied on the NIRB’s regulatory process to fulfill much of the procedural requirements of the Duty. We expect that the Minister will similarly rely on NIRB’s process again for SOP2. The Duty is among the most important mechanisms available for the protection of Inuit rights, and, as the Designated Inuit Organization for the Qikiqtani Region, QIA must have an opportunity to not only present its own evidence, but also to ensure that the NIRB, and eventually the Minister, fully understand the impact of SOP2 on Inuit rights. To do so effectively, QIA must have an opportunity, after all evidence is presented and the oral hearing is complete, to make its final submissions.

Therefore, QIA requests that the NIRB clarify that final written submissions will be accepted within a reasonable period of time (set at the NIRB’s discretion) following the Public Hearing.

¹ NIRB Doc #350071



Cumulative Effects

As QIA suggested in its May 23, 2024 SOP2 process comments, “... further guidance from the NIRB is required in order to define expectations on the depth and breadth of [Cumulative Effects Assessment] CEA discussions/review within the SOP2 review process, and what will constitute the ‘thorough CEA’ to occur outside the SOP2 review process.” In light of the positive cumulative effects workshop held in February 2024, this further guidance continues to be needed to ensure that the parties and the NIRB give the Proponent’s cumulative effects assessment the appropriate attention and consideration.

Having reviewed the Process Map, it is unclear to QIA whether the NIRB has considered the amount of focused time and process that will be required during the SOP2 technical and public hearing components to address the cumulative effects assessment and related issues. It is also unclear to QIA how the NIRB intends to address cumulative effects and the Proponent’s updated cumulative effects approach in the SOP2 process, or if a separate process is required.

QIA requests that the NIRB clarify its expectations for:

- where in the process map NIRB anticipates addressing the cumulative effects assessment, and whether it will be addressed as a discrete topic, or integrated with the rest of the technical review;
- if time will be set aside for addressing the cumulative effects assessment;
- how the NIRB expects to and how the NIRB expects the intervenors (including DIOs and regulating government departments) to address the cumulative effects assessment during SOP2.

While QIA has no doubt that all involved parties, as well as the NIRB, will be giving the cumulative effects assessment in SOP2 significant consideration at their own initiative, more guidance is required in light of the steps that have been taken over the past year to improve the ways, in which cumulative effects assessment is dealt with in the context of the Mary River Project.

The NIRB and the Parties worked collaboratively in February 2024 to take a positive first step towards addressing longstanding cumulative effects assessment concerns with the Mary River Project, and it is crucial to ensure this work is properly considered in this reconsideration.



Technical Review Timeline

The Process Map circulated by the NIRB on August 30, 2024 describes the initial technical review step beginning at Day 42 (September 30, 2024) as: “[the] NIRB receives IR responses and publishes with additional direction for technical review comments (45 days)”. However, the next step in the Process Map is listed at Day 73 (Oct 31, 2024) as “NIRB receives technical review comments from parties”. This timeline would have the parties’ technical review comments due 31 days, not 45 days, after Day 42/September 30. While QIA understands the 45 days might be inclusive of the Proponent’s response (Day 87/November 14), that is not clear from the Process Map, and we would appreciate clarification.

Community Information Session

QIA welcomes the NIRB’s standard approach of conducting community information sessions in the potentially impacted communities. QIA would like to express its inclination to participate in these sessions, where and when internal capacity permits, along with the NIRB and requests that the Board consider QIA’s participation in its plans.

QIA looks forward to further participation in this important process. Please do not hesitate to contact QIA in case of any questions.

Nakurmiik,

Assol Kubeisinova
Manager of Regulatory Review
Qikiqtani Inuit Association

Appendix A

IR Source and Number	QIA SOP2 IR1.
IR Directed To:	Baffinland Iron Mines Corporation (“Baffinland”)
Subject:	Alternatives
Reference:	Mary River Project – Sustaining Operations Proposal 2, Section 2.5, Evaluation of Alternatives
Issue/Concern:	Section 2.5, "Evaluation of Alternatives", does not consider the advantages and disadvantages of the three proposed alternatives for Inuit rights, culture, resources, and land use. Nor does it adequately describe the methods for identifying and evaluating alternatives.
Information Request:	Please describe the methods used to identify and evaluate alternatives to the Project. Please also identify whether and how the Tusaqtavut Studies and other available sources of Inuit Qaujimagatuqangit were used to objectively evaluate the advantages and disadvantages of all proposed alternatives for Inuit rights, culture, resources, and land use.

IR Source and Number	QIA SOP2 IR2.
IR Directed To:	Baffinland
Subject:	Inuit Engagement
Reference:	Mary River Project – Sustaining Operations Proposal 2, Section 3.2, Summary of Baffinland’s Approach to Inuit Engagement
Issue/Concern:	<p>Section 3.2, “Summary of Baffinland’s Approach to Inuit Engagement”, does not offer an objective analysis of feedback from Inuit communities about the Project by putting subjective emphasis on Inuit observations of positive impacts from the Project. Highlighting successful outcomes from engagement such as mitigation measures and modifications to the IIBA is not problematic, but the way these positive impacts are framed in relation to negative impacts has the potential to mislead, given the lack of comparative analysis showing the extent of positive or negative Inuit concern about the Project.</p> <p>For example, the authors use statements like “many” expressed support (73) while using diminutive terms like “some” to describe expressions of concern (74). Yet, the authors offer no indication of the relative preponderance of support compared with concern. Without an objective, well-researched quantitative and qualitative analysis showing the extent and nature of community support and concern about the Project, this language risks misleading.</p>
Information Request:	Please reorganize this section so that it either objectively describes, through well-researched quantitative and qualitative analysis, support for the project relative

	to concern about or opposition to the Project, or so that all biased language described above is removed and Inuit concern or opposition for the Project is portrayed on equal footing with support.
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IR Source and Number	QIA SOP2 IR3.
IR Directed To:	Baffinland
Subject:	Inuit Engagement
Reference:	Mary River Project – Sustaining Operations Proposal 2, Section 3.2.1, Summary of Relevant Project-related Engagements and Support since 2018.
Issue/Concern:	Table 3.5 “Summary of Key Engagement Outcomes” lists positive outcomes from engagement but does not present outstanding concerns.
Information Request:	Please present outstanding concerns and positive outcomes systematically and objectively in a way that allows readers to assess both positive outcomes and areas where further engagement is required.

IR Source and Number	QIA SOP2 IR4.
IR Directed To:	Baffinland
Subject:	Summary of Engagements
Reference:	Mary River Project – Sustaining Operations Proposal 2, 3.2.3.2 Summary of Engagements.
Issue/Concern:	Section 3.2.3.2 Summary of Engagements states that the “details” of engagement meetings “are maintained in StakeTracker, a licensed software used by Baffinland that creates a searchable database of feedback received” (83).
Information Request:	Please provide access to all non-confidential data described above so that the parties and NIRB can evaluate the results, responses, and effectiveness of Baffinland’s engagement activities.

IR Source and Number	QIA SOP2 IR5.
IR Directed To:	Baffinland
Subject:	Summaries of Feedback
Reference:	Mary River Project – Sustaining Operations Proposal 2, 3.2.3.2 Summary of Engagements.
Issue/Concern:	Baffinland’s summaries of feedback from Inuit communities (page 88 onward) describe some concerns expressed during engagement meetings, but do not explain whether these summaries are exhaustive of all concerns expressed or, if not, how Baffinland selected concerns to include here.

Information Request:	Please explain the methods Baffinland used to select which feedback to include. Please ensure the topics selected accurately represents all concerns, especially those raised frequently.
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IR Source and Number	QIA SOP2 IR6.
IR Directed To:	Baffinland
Subject:	Summaries of Feedback
Reference:	Mary River Project – Sustaining Operations Proposal 2, 3.2.3.2 Summary of Engagements
Issue/Concern:	Baffinland’s summaries of feedback from Inuit communities (page 88 onward) describe some concerns expressed during engagement meetings, but do not include a column for how Baffinland is addressing these concerns or plans to address these concerns in the future.
Information Request:	Please include a column for how Baffinland is addressing all concerns or plans to address these concerns in the future. If these concerns are addressed in this FEIS, please provide references to where the information is provided to facilitate effective review.

IR Source and Number	QIA SOP2 IR7.
IR Directed To:	Baffinland
Subject:	Cumulative Effects Assessment Framework
Reference:	Mary River Project – Sustaining Operations Proposal 2, 3.2.3.2 Summary of Engagements
Issue/Concern:	<p>Baffinland states that feedback in the CEA Framework Workshop informed the development of key aspects of the methods for the cumulative effects assessment for this application but does not explain how. These aspects include:</p> <ul style="list-style-type: none"> • Inclusion of Inuit Knowledge, IQ and community engagement • Focus on Indigenous rights and experience • Recognition of individual communities • Selection of Valued Components • Spatial and temporal scope • Significance thresholds and precautionary approach • Consideration of climate change • Tallurutiup Imanga • Incorporating CEA in monitoring programs

Information Request:	Please explain how comments from the parties were considered in addressing the elements from the bulleted list above, when responding to CEA concerns. Additionally, indicate specifically where concerns from Inuit parties and sources were considered.
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IR Source and Number	QIA SOP2 IR8.
IR Directed To:	Baffinland
Subject:	Impacts to Governance and Leadership and Community Wellbeing
Reference:	Mary River Project – Sustaining Operations Proposal 2, Section 5.2 Mitigation and Monitoring under Project Certificate No. 005 and Section 11.2.12, Governance and Leadership
Issue/Concern:	Table 5.2 and Section 11.2.12 Governance and Leadership state that “SOP2 is not predicted to have any change in effect on Governance and Leadership, consistent with both the ERP FEIS Addendum (Baffinland 2013) and the SOP (Baffinland 2023a) which also predicted no change in effects to this VC”. However, no information or rationale is provided for this conclusion. Impacts to Cultural Wellbeing do not appear to have been evaluated in this document. The establishment of the Inuit Committee and Environmental Working Groups was one such change to Governance.
Information Request:	Please provide more information on how impacts to cultural wellbeing and was assessed in order to help justify the above-noted assessment estimation. Please describe how governance and leadership changes will have an impact on the cultural well-being.

IR Source and Number	QIA SOP2 IR9.
IR Directed To:	Baffinland
Subject:	Spatial and Temporal Boundaries
Reference:	Mary River Project – Sustaining Operations Proposal 2, Section 6.2, Spatial and Temporal Boundaries.
Issue/Concern:	Section 6.2 describes the spatial and temporal boundaries for the assessment but does not explain how the spatial and geographical scope were informed by Inuit Qaujimajatuqangit or Inuit Qaujimaningit.
Information Request:	Please explain how the spatial and geographical scope were informed by Inuit Qaujimajatuqangit or Inuit Qaujimaningit

IR Source and Number	QIA SOP2 IR10.
IR Directed To:	Baffinland
Subject:	Baseline Conditions

Reference:	Mary River Project – Sustaining Operations Proposal 2, Section 6.2, Spatial and Temporal Boundaries.
Issue/Concern:	Section 6.2 states that “Details on pre-existing baseline conditions are described in Section 4 with additional detail available in the FEIS (Baffinland 2012) and ERP FEIS Addendum (Baffinland 2013).”
Information Request:	It is not reasonable to ask parties to review older documents. Please include any relevant detail from the FEIS or Addendum in this document and reference it accordingly.

IR Source and Number	QIA SOP2 IR11.
IR Directed To:	Baffinland
Subject:	Maps Resolution
Reference:	Mary River Project – Sustaining Operations Proposal 2, Section 6.2, Spatial and Temporal Boundaries.
Issue/Concern:	The maps in section 6.2 are blurry and illegible.
Information Request:	Please provide higher resolution maps.

IR Source and Number	QIA SOP2 IR12.
IR Directed To:	Baffinland
Subject:	Valued Components and Indicators
Reference:	Mary River Project – Sustaining Operations Proposal 2, Section 6.3, Scoping of Valued Components.
Issue/Concern:	<p>Section 6.3 states that “the following VCs are important considerations with respect to the Inuit Culture, Resources and Land Use VC, but Baffinland also acknowledges that these are closely linked to the effects assessment of biological VCs. Therefore, in addition to adopting the updated list of VCs recommended by QIA as shown in Table 6.1, this SOP2 FEIS Addendum refers to the Tusaqtavut VCs where possible, particularly in discussing potential impact pathways" (135).</p> <ul style="list-style-type: none"> • Marine Hunting • Terrestrial Harvesting • Fishing and Freshwater • Travel, Trails, and Habitation • Cultural Continuity
Information Request:	Please include these items as indicators in the assessment of impacts to Inuit Culture, Resources, and Land Use; Inuit travel route safety (for Travel, Trails and

	Habitation) and Cultural Wellbeing (for cultural continuity). Please update the assessments of these VCs with detailed information using these indicators.
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IR Source and Number	QIA SOP2 IR13.
IR Directed To:	Baffinland
Subject:	Inuit Rights
Reference:	Mary River Project – Sustaining Operations Proposal 2, Section 6.4, Indigenous Rights.
Issue/Concern:	Section 6.4 states that information on Indigenous Rights was integrated into the assessment but does not explain how Inuit participants were asked about impacts to their rights and the collection of Inuit Qaujimaningit or whether this assessment merely relies on voluntary/spontaneous expressions of the concept of rights. This information is necessary to clarify whether impacts to rights were evaluated systematically through the use of Inuit knowledge that was gathered objectively and thoroughly.
Information Request:	Please explain how Inuit participants were asked about impacts to their rights, or whether this assessment merely relies on voluntary/spontaneous expressions of the concept of rights.

IR Source and Number	QIA SOP2 IR14.
IR Directed To:	Baffinland
Subject:	Methods for Cumulative Effects Assessment
Reference:	Mary River Project – Sustaining Operations Proposal 2, Section 6.11.2.4, Other Projects and Activities
Issue/Concern:	Section 6.11.2.4 Other Projects and Activities does not adequately describe how past projects were researched and identified.
Information Request:	Please include detailed sources for all past projects and a more detailed description of how past projects were identified.

IR Source and Number	QIA SOP2 IR15.
IR Directed To:	Baffinland
Subject:	Methods for Cumulative Effects Assessment
Reference:	Mary River Project – Sustaining Operations Proposal 2, Section 6.11, Assessment of Cumulative Effects.
Issue/Concern:	Although improved, the scope of the cumulative effects assessment still does not consider impacts from projects whose impacts to Inuit may linger despite the project no longer being active. There is no indication that Inuit were consulted to determine whether to include such projects in the assessment.

Information Request:	<p>Please explain how determinations were made about impacts from past projects that, although no longer active, may have caused impacts that Inuit communities are still dealing with.</p> <p>Please describe whether and, if so, how these determinations were made through the use of Inuit Qaujimajatuqangit or Inuit Qaujimaningit and engagement with Inuit communities.</p> <p>Please include clear methodology for how the effects of past projects were evaluated.</p>
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IR Source and Number	QIA SOP2 IR16.
IR Directed To:	Baffinland
Subject:	Inadequate information on indicators
Reference:	Sustaining Operations Proposal 2, Attachment 7.2. Temporary Closure Planning: Socio-Economic Considerations for the Mary River Project, 3.3.1 Effects Assessment, Overview, p. 22; Table 3.1 Potential Socio-Economic Effects Resulting from Temporary Project Closure, p. 28-29
Issue/Concern:	It is unclear how the key indicator(s) presented in Table 3.1 were identified.
Information Request:	Please work with affected Inuit parties to identify key indicator(s) for Potential Socio-Economic Effects Resulting from Temporary Project Closure and include additional details on this the Temporary Project Closure process in the Overview section.

IR Source and Number	QIA SOP2 IR17.
IR Directed To:	Baffinland
Subject:	Inadequate characterization of cumulative effects across Valued Socio-Economic Components
Reference:	Sustaining Operations Proposal 2, Attachment 7.2. Temporary Closure Planning: Socio-Economic Considerations for the Mary River Project, 3.3.2 Summary of Effects, p. 22-27, Table 3.1 Potential Socio-Economic Effects Resulting from Temporary Project Closure, p. 28-29
Issue/Concern:	QIA notes that while tables are helpful for condensing information, detailed descriptions of cumulative effects are lacking.
Information Request:	Please update section 3.3.2 to fully describe potential cumulative socio-economic effects in detail across Valued Socio-Economic Components resulting from temporary project closure

IR Source and Number	QIA SOP2 IR18.
IR Directed To:	Baffinland

Subject:	Inuit Engagement
Reference:	Sustaining Operations Proposal 2, Section 13: Effects of the Environment on the Project
Issue/Concern:	<p>Page 452 of the “Sustaining Operations Proposal 2” document states that “The Climate Change Strategy focuses on mitigation and adaptation approaches at the Mary River Mine Site. Baffinland remains committed to informing Inuit and Stakeholders on the progress of its efforts in implementing the Climate Change Strategy and ensuring IQ and Inuit perspectives are considered.”</p> <p>This phrase requires further clarification from the Proponent as to how Inuit Qaujimagatuqangit and Inuit perspectives have been considered throughout the development of the Climate Change Strategy. As it stands, the wording suggests that the Strategy was developed without these perspectives since Baffinland provides no information on how Inuit were engaged</p>
Information Request:	Please provide more information about whether and how Inuit were engaged throughout the development of the Climate Change Strategy. Additionally, QIA recommends that the Proponent describe in detail what measures in the Climate Change Strategy are in place to ensure that Inuit Qaujimagatuqangit and Inuit perspectives will be considered.

IR Source and Number	QIA SOP2 IR19.
IR Directed To:	Baffinland
Subject:	Inuit Engagement
Reference:	Sustaining Operations Proposal 2, Section 14: Transboundary Effects of the Project
Issue/Concern:	<p>Page 455 describes how, through Project planning and design as well as through the implementation of mitigation measures, the likelihood of fuel spills is reduced. It then describes how the vessels will adhere to regulations from Denmark, Canada, and MARPOL to further reduce the risk of spills. It then mentions how the implementation of emergency response measures would reduce the consequences of adverse effects.</p> <p>There is a notable absence of references to Inuit involvement or Inuit Qaujimagatuqangit being considered throughout the development of mitigation and emergency response measures to reduce the risk of fuel spills.</p>
Information Request:	QIA requests that Baffinland clarify whether and how Inuit Qaujimagatuqangit has informed the development of mitigation measures and emergency response measures in place to reduce the likelihood and consequences of fuel spills along the shipping route.

IR Source and Number	QIA SOP2 IR20.
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IR Directed To:	Baffinland
Subject:	Communication with Inuit on Adaptive Management
Reference:	<p>Sustaining Operations Proposal 2, Section 16: Project Oversight and Adaptive Management</p> <p>Sustaining Operations Proposal 2, Attachment 1.4, Cumulative Effects Assessment Workshop Information Request Responses.</p>
Issue/Concern:	<p>Section 16.2.3 “Adaptive Management Response Framework” describes the mechanisms that the Proponent will adopt to communicate with community members about the updates that to the Adaptive Management Plan (and monitoring and mitigation plans) throughout operations. In this section, the Proponent provides limited details about the communication mechanisms to inform community members of updates to the monitoring and mitigation plans during operations. The Proponent is expected to outline how these communications will be conducted, such as through website updates, community forums, newsletters, or other methods.</p> <p>There is no assurance provided in this section that there will be a feedback mechanism in place for community members to voice their concerns about the Adaptive Management Plan (as well as associated monitoring and mitigation plans) to the Proponent. Having feedback mechanisms in place is important to ensure that community members can provide direct input on the Adaptive Management Plans and associated strategies. This input is crucial for aligning the plans with community concerns and for integrating Inuit Qaujimajatuqangit into the project’s management approach.</p> <p>Likewise, page 4 of Baffinland’s July 18, 2024 memo titled “Summary of Approved Project Monitoring Activities Informing Ongoing Baffinland Review of Cumulative Effects Predictions” states that “The outcomes of Inuit and Baffinland led monitoring programs can lead to direct actions over threshold exceedances through select jointly agreed to components of the Adaptive Management Plan (AMP).” However, no details are provided about such jointly agreed to components of the AMP.</p>
Information Request:	<p>QIA requests that the Proponent provide a more detailed outline of their communication mechanisms that will be used to inform community members about updates to monitoring and mitigation plans associated with the Adaptive Management Plan. This outline should include specifics on how the communications will be conducted and the frequency that these communications will be provided.</p> <p>QIA also asks that the Proponent confirm whether and what type of feedback mechanisms will be implemented to allow community members to voice their concerns and provide direct input on the Adaptive Management Plan and its implementation. QIA emphasizes the importance of establishing feedback mechanisms for the Project to ensure that Inuit Qaujimajatuqangit and Inuit perspectives are integrated into the Adaptive Management Plan, and associated monitoring and mitigation measures.</p>

IR Source and Number	QIA SOP2 IR21.
IR Directed To:	Baffinland
Subject:	Accessibility of Community Engagement Records
Reference:	Appendix 1: Community Engagement Records
Issue/Concern:	Attachment 1.1, Community Engagement Records does not contain a table of contents and is difficult to navigate.
Information Request:	Please provide a table of contents for all Community Engagement Records and organize the material so that it is easy to navigate.

IR Source and Number	QIA SOP2 IR22.
IR Directed To:	Baffinland
Subject:	Inuit engagement
Reference:	Attachment 2.2, Steensby Baseline Studies Summary (2021-2024)
Issue/Concern:	<p>Some of the reports and studies listed in this document (but not provided) may contain Inuit Qaujimagatqangit or information that is relevant to the assessment of SOP2 and cumulative impacts to Inuit Culture, Resources, and Land Use (CRLU). This includes but is not limited to studies addressing the following topics:</p> <ul style="list-style-type: none"> • Ice study • Terrestrial • Archaeology • Marine environment • Freshwater environment • Marine Mammals • Socio-Economic
Information Request:	<p>Please provide all relevant reports that are not already included with the current SOP2 Application, including:</p> <ul style="list-style-type: none"> • Steensby Inlet Iron Ore Shipping Project – Fixed Wing Survey • Steensby Inlet Fast Ice Study • Multibeam Bathymetric Survey in Steensby Inlet – Marine Survey Operations Report • 2021-22 Steensby Physical Oceanography Program • Steensby Port and Railway Freshwater Habitat Surveys: Non-Fish Bearing Sites 2021-2023

	<ul style="list-style-type: none"> • Potential Offsetting Sites: 2023 Freshwater Habitat Surveys • Water Withdrawal Notification and Hydrological Assessment – Steensby Component • Steensby Port Arctic Char Otolith Analysis • Fish Passage Assessment – Steensby Component • Construction of the Steensby Inlet Railway Underwater Noise Modelling Report: Freshwater • Terrestrial Environment – 2021 Annual Monitoring Report, which includes satellite-based dust monitoring of the Steensby Port area • 2023 Late-Winter Aerial Caribou Survey Summary Report • Summary of Baffinland’s 2023 Data Collection Programs and Planning <p>QIA also requests that Baffinland provide forthcoming reports to QIA when they are available.</p>
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IR Source and Number	QIA SOP2 IR23.
IR Directed To:	Baffinland, Government of Nunavut
Subject:	North Baffin Caribou Range
Reference:	<p>Sustaining Operations Proposal 2, figure 6.2, p. 132</p> <p>Sustaining Operations Proposal 2, Attachment 3.3 QIA Comments on SOP2 Proposal, p. 182</p> <p>GN DOE. 2019. “Baffin Island Caribou Management Plan: Working Together to Ensure Baffin Island Caribou Harvest Is Sustainable.” https://www.nwmb.com/iku/list-all-site-files/nwmbmeetings/regular-meetings/2020-1/rm-001-2020-iqaluit-march-11-2020/english-10/8002-tab2b-gn-mp-baffin-island-caribou-mp-eng/file</p>
Issue/Concern:	<p>QIA’s April 24, 2024, comment #3 regarding the spatial boundary of the cumulative effects assessment requested that Baffinland update the spatial scope of their cumulative effects assessment to align with the approximate range of caribou on North Baffin Island as shown in GN 2019.</p> <p>Baffinland replied that they updated section 6.2 and figure 6.2 to include a description and depiction of the North Baffin Island caribou range.</p> <p>QIA acknowledges that section 6.2 has been updated but notes that figure 6.2 appears to remain unchanged with regards to the North Baffin Island caribou ranges.</p>
Information Request:	QIA requests that Baffinland share the revised version of figure 6.2 that they noted in their reply to QIA’s comment #3.

IR Source and Number	QIA SOP2 IR24.
IR Directed To:	Baffinland
Subject:	Isopleth Modelling
Reference:	Sustaining Operations Proposal 2, Attachment 3.3 QIA Comments on SOP2 Proposal, p. 186 and 187 SOP2, Attachment 5.2 6 Mtpa Isopleth Modelling
Issue/Concern:	<p>QIA’s April 24, 2024 comment #16 and #20 is in regard to requesting the spatial scale of air quality modeling be extended to the entire length of the Tote Road, southern railway, and Steensby Port.</p> <p>With regard to requests to expand the model’s spatial scale to include the Tote Road, Baffinland replied that “the spatial scales... are sufficient to assess potential effects at the dustfall receptors outside of the study area used for the air dispersion model.” (p. 186).</p> <p>QIA remains concerned by the lack of specific spatial information on the extent of dustfall levels extending from the Tote Road and notes that this adds unnecessary uncertainty to the effects assessment.</p> <p>With regard to requests to expand the model’s spatial scale to include the southern railway and Steensby Port, Baffinland replied that “A dust monitoring program will be developed before construction commences on the Steensby Components of the Project, which are outside the scope of this application.” (p. 187).</p> <p>QIA disagrees with Baffinland’s assertion that expanding the scope of air quality modeling to include both the southern railway and Steensby Port is beyond the scope of the SOP2 application. The construction of the southern railway and Steensby Port are critical milestones in SOP2 and the requested term and condition amendments. QIA notes that dust generated from the construction of the southern railway and Steensby Port and the operation of the southern railway below commercial rates could act additively with dust generated from continued mine site operations, Tote Road operations, and Milne Port operations (i.e. combined effects), and, therefore, should be modeled to address this current gap in information.</p>
Information Request:	QIA requests that Baffinland address the information gap by providing air quality modeling with a spatial extent that includes the entirety of the Tote Road, southern railway, and Steensby Port.

IR Source and Number	QIA SOP2 IR25.
IR Directed To:	Baffinland
Subject:	Surface Water and Aquatic Ecosystem Management Plan

Reference:	<p>Document Name: Surface Water and Aquatic Ecosystem Management Plan; NIRB Notice Re Scope and Conformity SOP2; NIRB Concordance Table SOP2 Impact Statement Addendum</p> <p>Section: 9.4.3 Page: 42</p>
Issue/Concern:	<p>When discussing the construction of the Steensby Port and Railway in regard to the water quality and quantity monitoring programs the proponent states, <i>“water quality or quantity monitoring programs have not been initiated at the Steensby Port location. This plan will be updated prior to the commencement of construction of Steensby Port and the associated railway to reflect planned surface water management and monitoring”</i></p> <p>In July 2024, the NIRB issued a notice on scope and conformity for SOP2 highlighting the need for plans within the IS addendum to be updated to support the required public review. In their concordance table the NIRB has noted that <i>“It is expected that the majority of relevant existing Environmental Management Plans and their proposed updates should be presented with the IS Addendum to support the required public technical review.”</i></p> <p>QIA notes that updates to the Surface Water and Aquatic Ecosystem Management Plan remain outstanding. The AEMP should be updated prior to the technical review phase of these proceedings because the construction and operation of the Steensby Rail and Port are critical milestones within SOP2. How the proponent proposes to monitor for potential aquatic effects should be included as part of the technical review.</p>
Information Request:	<p>QIA requests the Proponent update the Surface Water and Aquatic Ecosystem Management Plan to include proposed monitoring for the Steensby Rail and Port ahead of the technical review of SOP2. This update is also required to address the NIRB direction on scope and conformity for the IS application.</p>

IR Source and Number	QIA SOP2 IR26.
IR Directed To:	Baffinland
Subject:	Snow Management
Reference:	<p>Document Name: Snow Management Plan; NIRB Notice Re Scope and Conformity SOP2; NIRB Concordance Table SOP2 Impact Statement Addendum</p>
Issue/Concern:	<p>The Snow Management plan has not been updated to address reviewer concerns that detail is insufficient to function as a stand-alone document nor have the locations of the snow stockpiles been altered or discussed to avoid interactions with the aquatic environment (e.g., near Sheardown and Camp lakes).</p>

Information Request:	QIA requests the Proponent update the Snow Management Plan addressing concerns raised during the review of the 2023 Annual Report (QIA 2023 Annual Report Comments QIA-HESL-NIRB-48, 49 and 50).
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IR Source and Number	QIA SOP2 IR27.
IR Directed To:	Baffinland
Subject:	Air Quality & Noise Abatement Management Plan
Reference:	Document Name: Air Quality & Noise Abatement Management Plan (AQNAMP); NIRB Notice Re Scope and Conformity SOP2; NIRB Concordance Table SOP2 IS Addend Section: 5.4.3 Page: 33
Issue/Concern:	<p>In July 2024, the NIRB issued a notice on scope and conformity for the SOP2 highlighting the need for plans within the IS addendum to be updated to support the required public review. In their concordance table the NIRB has noted that <i>“It is expected that the majority of relevant existing Environmental Management Plans and their proposed updates should be presented with the IS Addendum to support the required public technical review.”</i></p> <p>Steensby Port and Rail construction and operation has not been incorporated into the AQNAMP as intended and cannot be reviewed for SOP2. Section 5.4.3 does not include Steensby construction or operation sampling details or plans. Steensby Port locations for Air Quality monitoring need to be included in a revised Air Quality & Noise Abatement Management Plan to lay out how monitoring will take place following construction of the Steensby Port and Rail.</p> <p>The proponent has yet to finalize the adaptive management components of the Air Quality & Noise Abatement Management Plan, which will establish clear criteria for identifying and responding to low, moderate and high risk thresholds, should they be met. This should be completed ahead of technical review of the SOP2.</p>
Information Request:	QIA requests the Proponent update the Air Quality & Noise Abatement Management Plan to include monitoring locations and adaptive management criteria for the Steensby construction and operation. This update is also required to address the NIRB direction on scope and conformity for the IS application.

IR Source and Number	QIA SOP2 IR28.
IR Directed To:	Baffinland
Subject:	Fresh Water Supply, Sewage and Wastewater Management Plan
Reference:	Document Name: Fresh Water Supply, Sewage and Wastewater Management Plan (FWSSWMP); NIRB Notice Re Scope and Conformity SOP2;

	<p>NIRB Concordance Table SOP2 IS Addend</p> <p>Section: Table 7 and Section 6.3.4</p>
Issue/Concern:	<p>In July 2024, the NIRB has issued a notice on scope and conformity for the SOP2 highlighting the need for plans within the IS addendum to be updated to support the required public review. In their concordance table the NIRB has noted that <i>“It is expected that the majority of relevant existing Environmental Management Plans and their proposed updates should be presented with the IS Addendum to support the required public technical review.”</i></p> <p>The proponent noted in the FWSSWM Plan that <i>“This plan will be updated prior to the commencement of construction of Steensby Port and the associated railway to reflect planned water management and monitoring.”</i></p> <p>These Plans should be updated prior to technical review of the SOP2. Steensby component of the sewage treatment facility monitoring remains missing from Table 7 and Section 6.3.4 has not been updated to reflect the proposed plan during construction and operation of the Steensby Rail and Port as necessary.</p>
Information Request:	<p>QIA requests the Proponent update the Fresh Water Supply, Sewage and Wastewater Management Plan to include monitoring locations associated with the Steensby component of the project – along the railway and proximal to the port.</p>

IR Source and Number	QIA SOP2 IR29.
IR Directed To:	Baffinland
Subject:	Climate Change
Reference:	<p>Document Name: Transitional Operations Proposal;</p> <p>Section: Table 1</p> <p>Page: 7</p>
Issue/Concern:	<p>The Transitional Operations Proposal states that <i>“The SOP FEIS Addendum will include an assessment of the effects of the environment on the Project and include considerations for climate change.”</i></p> <p>Concerns have been raised in the past about the climate change modelling that has been used for the project given the SOP2 time frame extension. Specifically, QIA Draft SOP2 #4 highlighted the need for updated climate change modelling using more recent IPCC models.</p> <p>It does not appear that Baffinland has considered more recent IPCC models and predictions (i.e., past 2014). It is becoming more common for proponents to focus on more severe scenarios such as RCP 8.5 which will have a direct impact on the flows and permafrost in the region, particularly proximal to water crossings along the Tote road and the yet to be constructed rail line where water will be</p>

	<p>channelized and vibration from project activities (truck and rail traffic) will further degrade permafrost.</p> <p>This has not been incorporated into the Technical Supporting Document (TSD) 06 Climate Change Assessment included in the IS Addendum which appears to be the same 2018 document used during the Phase 2 proposal.</p>
Information Request:	<p>Given this application is expected to carry forward through to when the Steensby Rail and Port become operational (as far out as 2032), the proponent should update climate change modelling to include the most recent IPCC scenarios.</p>

IR Source and Number	QIA SOP2 IR30.
IR Directed To:	Baffinland
Subject:	Freshwater Baselines Studies
Reference:	<p>Document Name: Steensby Baseline Studies Summary</p> <p>Section: Table 2</p> <p>Page: 3</p>
Issue/Concern:	<p>Proponent noted that in 2024 field studies were planned for <i>“freshwater environment aquatic habitat surveys at proposed water intake sites, and fish and fish habitat surveys at lake encroachments/ stream crossings and culvert locations not previously surveyed along rail alignment”</i>.</p> <p>No details are available on these studies for public review to inform how these data will facilitate monitoring comparisons in the future during construction and operation of the Steensby Rail and Port.</p>
Information Request:	<p>QIA requests the Proponent provide details of these baseline studies and how they will inform the monitoring and adaptive management criteria for the Steensby construction and operation in the future as part of the SOP2 review process.</p>

IR Source and Number	QIA SOP2 IR31.
IR Directed To:	Baffinland
Subject:	Map Clarity
Reference:	<p>Document Name: Baffinland NIRB Annual Report, Snow Management Plan</p> <p>Section: Figures 1-11</p> <p>Page: 23, 24, 27, 28, 33-38, 43</p>
Issue/Concern:	<p>Figures provided on pages 23, 24, 27, 28, 33-38, and 43 of the Snow Management Plan are of low resolution and are difficult to read and review</p>
Information Request:	<p>QIA requests that the figures provided in the Snow Management Plan be replaced with higher-resolution figures.</p>

IR Source and Number	QIA SOP2 IR32.
IR Directed To:	Baffinland
Subject:	Snow Management Plan
Reference:	Document Name: Snow Management Plan Section: Table 5 Page: 13
Issue/Concern:	Table 5 of the Snow Management Plan provides information on snow clearing along the Tote Road, and states that snow clearing will “ <i>avoid or minimize barrier effects on wildlife movement</i> ” (P13). No specific triggers or mitigative actions are provided in the document, although references to snowbank height monitoring (as part of the Terrestrial Environment Mitigation and Monitoring Plan - TEMMP) and the Roads Management Plan are provided. It is difficult to evaluate any potential impacts of the Tote Road snow clearing on wildlife mobility without specific information from the TEMMP snowbank height monitoring and Roads Management Plan. This information should be included in Table 5 of the Snow Management Plan, for ease of review and document completeness, providing a single streamlined document that can be consulted if snowbank height or Tote Road snow clearing are found to be disruptive to wildlife migration.
Information Request:	QIA requests that the proponent provide a more specific reference to the TEMMP snowbank height monitoring and Roads Management Plan, or provide pertinent information about the specific mitigative actions that will be taken if snowbanks on the Tote Road are found to be high enough to disrupt wildlife migration.

IR Source and Number	QIA SOP2 IR33.
IR Directed To:	Baffinland
Subject:	Steensby Adaptive Management
Reference:	Adaptive Management Plan – NIRB File No 349416
Issue/Concern:	The Adaptive Management Plan does not seem to have been updated for the Steensby Rail and Port, which are critical milestones within SOP2. Some non-exhaustive examples are below Section 1.1: The document does not appear to have been updated for the Southern Shipping Route, as Section 1.1 makes a commitment related to travel through the Talluritiup Imanga National Marine Conservation Area (NMCA). While this is a valid statement for the Northern Transportation Route, it leads the reader to believe the Southern Shipping Route has not been addressed, or that the document has not been updated for SOP2. The Proponent proposes for SOP2 to end when commercial transportation rates from Steensby Rail and Port have been achieved, but the Adaptive Management Plan does not address transportation from Steensby Port.

	Section 3.4.4: There seems to only be a specific Oil Pollution Emergency Plan for Milne Inlet.
Information Request:	Update the document to reflect any changes due to Steensby Rail and Port and consider those specialized areas that need specific reference to the shipping route.

IR Source and Number	QIA SOP2 IR34.
IR Directed To:	Baffinland
Subject:	
Reference:	Aquatic Effects Monitoring Plan, NIRB File No 349414, Sections 2.3.6.3 and 3.1.3.8
Issue/Concern:	<p>The DFO Blasting Near Water guidelines give reference to a kPA threshold for fish. However, in current DFO FAAs and LoAs, kPA is rarely used. The dB equivalent should be provided. Further, consideration should be given to if thresholds provided in a document that was published well before current legislative changes in the Fisheries Act are still relevant, or if a more conservative approach should be taken.</p> <p>Section 2.3.6.3 of the Aquatic Effects Monitoring Plan mentions that Baffinland will apply a 50 kPa threshold, for a conservative approach.</p>
Information Request:	<p>Update the document to ensure that the 50 kPa threshold is mentioned wherever the 100 kPa threshold is mentioned.</p> <p>If noise is being measured in dB, then provide the conversion (which is aligned with latest guidance from DFO-FFHPP).</p>

IR Source and Number	QIA SOP2 IR35.
IR Directed To:	Baffinland
Subject:	Presentation of data
Reference:	Aquatic Effects Monitoring Plan, NIRB File No 349414
Issue/Concern:	<p>The construction and operation of Steensby Rail and Port is a critical milestone for the SOP2, and an integral part of the proposed amended term and condition.</p> <p>It is difficult to determine the extent of aquatic impacts associated with the construction and operational phases of the Steensby Rail and Port.</p>
Information Request:	Provide a map that shows the lakes and rivers which have the potential to be impacted during the construction and operation phases of Steensby Rail and Port.

IR Source and Number	QIA SOP2 IR36.
IR Directed To:	Baffinland
Subject:	Duration of climate change modelling
Reference:	Climate Change Strategy, NIRB File No 349415
Issue/Concern:	This document predicts climate change effects to only 2028, which is four years prior to the potential end date of SOP2.
Information Request:	Update this document (and any other documents which rely on these models) to predict climate change effects for a 30-year period (or whatever lesser period is the longest that can be modelled). Update any analysis in the Impact Statement which depend on these models accordingly.

IR Source and Number	QIA SOP2 IR37.
IR Directed To:	Baffinland
Subject:	Permit identification
Reference:	Marine Monitoring Plan, NIRB File No 349409
Issue/Concern:	Reports do not adequately reference the permit they are about.
Information Request:	Please update this document to include permit identification numbers in brackets next to each mention of applicable permits.

IR Source and Number	QIA SOP2 IR38.
IR Directed To:	Baffinland
Subject:	Relevancy
Reference:	Marine Monitoring Plan, NIRB File No 349409, Table 2-2
Issue/Concern:	It is unclear whether the adaptive management checklist takes into consideration the current status of the Project.
Information Request:	Please confirm if Table 2-2 is updated to reflect the current status.

IR Source and Number	QIA SOP2 IR39.
IR Directed To:	Baffinland
Subject:	Southern Shipping during SOP2
Reference:	Shipping and Marine Wildlife Management Plan, NIRB File No 349405 IS Addend Att 6.5, Underwater Acoustic, NIRB File No 350995

Issue/Concern:	During SOP2, between the completion of construction of Steensby Rail and Port and the achievement of commercial transportation, some ore will be shipped from Steensby Port, however, several documents in the impact statement addendum do not address shipping along the southern shipping route.
Information Request:	Update all applicable documents (including but not limited to the references in this IR) to account for shipping along the southern route which will occur during SOP2.