



NIRB File No.: 08MN053
NPC File No.: 149960
NWB File No.: 2AM-MRY1325
QIA File No.: LUA-2008-008
DFO File No.: 2008 MR

September 26, 2024

To: Megan Lord-Hoyle
Vice President,
Baffinland Iron Mines Corporation
2275 Upper Middle Rd E Suite. 300
Oakville, Ontario, L6H 0C3

Sent via email: megan.lord-hoyle@baffinland.com

**Re: Information Requests received from Parties regarding Baffinland Iron Mines Corp.'s
"Sustaining Operations Proposal 2" Project Proposal**

Dear Megan Lord-Hoyle:

On September 20, 2024, the Nunavut Impact Review Board (NIRB or Board) received the following parties' Information Requests (IRs) regarding the Impact Statement (IS) Addendum submitted by Baffinland Iron Mines Corp. (Baffinland or Proponent) for NIRB's assessment of the "Sustaining Operations Proposal 2" Project Proposal.

All documentation associated with the "Sustaining Operations Proposal 2" Project Proposal, including IR submissions, can be accessed at the NIRB's Public Registry at www.nirb.ca/project/125893 or by searching the Public Registry using the Document ID numbers listed below.

Party	# of IRs	Document ID No.
Qikiqtani Inuit Association (QIA)	39	351548
Government of Nunavut (GN)	14	351549
Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC)	3	351546
Environment and Climate Change Canada (ECCC)	2	
Fisheries and Oceans Canada (DFO)	4	
Health Canada (HC)	3	
Parks Canada (PC)	1	
Government of Greenland	1	

Party	# of IRs	Document ID No.
Mittimatalik Hunters and Trappers Organization	1	351501
Iglolik and Sanirajak Hunters and Trappers Association	4	351503
IUOE Local 793	1	351504
Oceans North	3	351547

The NIRB has completed its review of the IRs received and some are outside the scope of information required for this assessment phase and will be discussed through the technical review stage or a partial response is expected (Appendix A). As the Proponent is not required to address the items within its IR Response Package, the NIRB strongly recommends that Baffinland thoroughly review each party's submission and make its own determination regarding the need for or its ability to provide an appropriate response. Baffinland's Response to Information Requests and IRs directed to the NIRB and QIA are due on **October 1, 2024**.

The NIRB is also submitting Information Requests in Appendix B and requests a response by **October 4, 2024**.

CALL FOR TECHNICAL REVIEW COMMENTS

Parties are invited to continue their review the IS Addendum submission and develop technical review comments on items for which they are not awaiting an IR response. Throughout the technical review period, interested parties are encouraged to work cooperatively with Baffinland to discuss issues in advance of the Technical Meeting, Community Roundtable and Pre-hearing Conference. The NIRB requests to remain informed of any agreement(s) reached between the parties on issues related to the "Sustaining Operations Proposal 2" and the IS Addendum.

The NIRB is requesting that responsible authorities, interested parties, and those with specialist advice provide their technical **review comments to the NIRB by the conclusion of the public technical commenting period on October 31, 2024** either by email at info@nirb.ca or through the Public Registry at www.nirb.ca.

Parties should review Appendix C, which describes the NIRB's format for the development/submission of technical review comments. The information **must** also be included with the submissions:

- Determination of whether Parties agree/disagree with the conclusions in the IS Addendum regarding: the alternatives assessment; environmental impacts; proposed mitigation; significance of impacts; and monitoring measures; and the rationale used to support the determination;
- Determination of whether or not conclusions in the IS Addendum are supported by the analysis, and the rationale used to support the determination;
- Determination of whether appropriate methodology was utilized in the IS Addendum to develop conclusions, and the rationale used to support the determination, along with any proposed alternative methodologies which may be more appropriate (if applicable);

- An assessment of the appropriateness of proposed monitoring measures, and the rationale used to support the determination, along with any proposed alternative monitoring measures which may be more appropriate (if applicable);
- Any comments regarding additional information which would be useful in assessing impacts, and the rationale used to support any comments made; and
- Identification of any terms and conditions of the Project Certificate No. 005, Amendment 005 that are believed to require amendment to reflect the “Sustaining Operations Proposal 2” Project Proposal.

If you have any questions regarding the NIRB’s assessment of the “Sustaining Operations Proposal 2” project proposal, please contact Kelli Gillard, Senior Impact Assessment Officer, at kgillard@nirb.ca.

Sincerely,



Keith Morrison
Manager, Impact Assessment
Nunavut Impact Review Board

Attachments: *Appendix A: Information Requests Identified by the NIRB as Requiring a Modified Response or No Response at This Time*
 Appendix B: NIRB Information Requests
 Appendix C: Format for Parties Technical Review Comment

cc: Mary River Distribution List
 Lou Kamermans, Baffinland Iron Mines Corp.
 Richard Dwyer, Nunavut Water Board
 Nidhi Singh, Nunavut Water Board
 Dustin Fredlund, Nunavut Tunngavik Incorporated
 Carson Gillis, Nunavut Tunngavik Incorporated
 Jorgen Aitaok, Nunavut Tunngavik Incorporated
 Jared Ottenhof, Qikiqtani Inuit Association
 Chris Spencer, Qikiqtani Inuit Association
 Conor Goddard, Qikiqtani Inuit Association
 Joel Fortier, Qikiqtani Inuit Association
 Assol Kubeisinova, Qikiqtani Inuit Association
 Justin Buller, Government of Nunavut
 Dianne Lapierre, Government of Nunavut
 Spencer Dewar, Crown Indigenous-Relations and Northern Affairs Canada
 Adrian Paradis, Canadian Northern Economic Development Agency
 Kaitlyn Bakker, Canadian Northern Economic Development Agency
 Environment and Climate Change Canada General Inbox
 Marie-Claude Martel, Parks Canada
 Jane Chisholm, Parks Canada

José Audet-Lecouffe, Fisheries and Oceans Canada
Peter Unger, Natural Resources Canada
Pierre-Olivier Emond, Natural Resources Canada
Paul Partridge, Health Canada
Jaideep Johar, Transport Canada
Micheal Ferguson, Qikiqtaaluk Wildlife Board
Joshua Arreak, Hamlet of Pond Inlet
David Qamaniq, Mittimatalik Hunters and Trappers Organization
George Auksaq, Hamlet of Igloolik
David Irngaut, Igloolik Hunters and Trappers Association
Olayuk Naqitarvik, Hamlet of Arctic Bay
Qaumayuq Oyukuluk, Ikajutit Hunters and Trappers Association
Phillip Anguratsiaq, Hamlet of Sanirajak
Paul Nangmalik, Sanirajak Hunters and Trappers Association
Liemiekee Palluq, Hamlet of Clyde River
Apiusie Apak, Nangmoutaq Hunters and Trappers Association
Maliktoo Luya, Hamlet of Kimmirut
Mikidjuk, Kimmirut Hunters and Trappers Association
Jimmy Manning, Hamlet of Kinngait
Adamie Nuna, Aiviq Hunters and Trappers Association
Chris Debicki, Oceans North
World Wildlife Fund

APPENDIX A: INFORMATION REQUESTS IDENTIFIED BY THE NIRB AS REQUIRING A MODIFIED RESPONSE OR NO RESPONSE AT THIS TIME

The NIRB has identified those Information Requests (IRs) which either require a modified response, or which appeared to be more appropriately addressed through technical review comments (Table 1).

While it develops its response, the Proponent is expected to consult with parties as necessary to ensure the information provided meets the expectations of reviewers moving forward. Where multiple IRs have the same or similar information requirements, the Proponent should provide one (1) response to adequately address all the requests to avoid unnecessary duplication.

Table 1: IRs to be deferred or modification of response

IR #	Information Request	NIRB Direction
Qikiqtani Inuit Association		
QIA IR #2	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.	IR- Please explain how Baffinland conducted its qualitative and quantitative assessment of comments it used in the IS Addendum.
QIA IR #10	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 - Please provide the Document ID number for materials referenced on the NIRB's Public Registry.
QIA IR #13	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.	Technical Comment
QIA IR #16	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.	Technical Comment

IR #	Information Request	NIRB Direction
QIA IR #18	<p>Provide more information about whether and how Inuit were engaged throughout the development of the Climate Change Strategy.</p> <p>Additionally, QIA recommends that the Proponent describe in detail what measures in the Climate Change Strategy are in place to ensure that Inuit Qaujimajatuqangit and Inuit perspectives will be considered.</p>	<p>IR – request in first sentence</p> <p>Technical Comment- second sentence</p>
QIA IR #20	1) 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.	Technical Comment
QIA IR #21	Provide a table of contents for all Community Engagement Records and organize the material so that it is easy to navigate.	<p>IR – please provide a Table of Contents;</p> <p>Technical Comment - reorganize the materials so it is easier to navigate</p>
QIA IR #22	<p>Provide all relevant reports that are not already included within the current SOP2 Application.</p> <p>See IR#22 for further details on the reports requested by QIA.</p>	IR - Please provide the Document ID number for materials referenced on the NIRB's Public Registry.
QIA IR #25	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.	Technical Comment
QIA IR #27	Requests the Proponent update the Air Quality & Noise Abatement Management Plan to include	Technical Comment

IR #	Information Request	NIRB Direction
	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.	
QIA IR #28	Requests the Proponent update the FWSSWMP to include monitoring locations associated with the Steensby component of the project – along the railway and proximal to the port.	Technical Comment
QIA IR #31	Requests that the figures provided in the Snow Management Plan be replaced with higher-resolution figures.	Technical Comment
QIA IR #32	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 - Please reference the current version of the plan and where to find further information. Technical Comment-discussion of details
QIA IR #34	Update the document to ensure that the 50 kPa threshold is mentioned wherever the 100 kPa threshold is mentioned. If noise is being measured in dB, then provide the conversion (which is aligned with latest guidance from DFO-FFHPP).	Technical Comment
QIA IR #36	1) 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).	IR – provide a summary regarding validation of use of previous climate change data the was used for the IS Addendum
	2) Update any analysis in the Impact Statement which depend on these models accordingly.	Technical Comment
QIA IR #37	Update this document to include permit identification numbers in brackets next to each mention of applicable permits.	Technical Comment
QIA IR #39	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.	Technical Comment

IR #	Information Request	NIRB Direction
Government of Nunavut		
GN IR #1	1) The Proponent should provide details of the quantitative methods used for the CEA of caribou habitat loss (direct and indirect) that was conducted for the IS Addendum including (but not limited to); (a) the area of direct habitat loss associated with each project/activity listed in Table 8.6, and (b) details on the zone-of-influence and disturbance coefficients that were applied for each project/activity listed in Table 8.6 and the literature or other sources that informed these determinations.	Technical Comment
GN IR #3	The Proponent should upload a copy of the 2023 Late Winter Aerial Caribou Survey Summary Report to the NIRB Registry.	IR – discuss if this information is publicly available from another source and if not, why.
GN IR #6	1) The Proponent should provide a table showing the number of caribou observed annually from 2013 to 2023 via HOL surveys versus the number observed within, or within sight of the Project Development Area (PDA) and in regions outside the PDA.	Technical Comment
	4) The Proponent should provide a review of the collar data collected since 2013, including maps of locations and movements overlapping the IS Addendum's study area for caribou. The Proponent should provide analyses of interactions with the Project should sample size permit, and clearly indicate if sample sizes are too small to support analyses.	Technical Comment
GN IR #10	Table 1 – Commitment #2 1) The Proponent should clarify when and how 'guiding animals away from worksites' would be implemented. 2) The Proponent should clarify what criteria will govern the decision to guide caribou away. 3) The Proponent should clarify whether caribou will be guided away to allow Project activities	Technical Comment

IR #	Information Request	NIRB Direction
	<p>(e.g., blasting, loading of ore and trucking along the Tote Road) to proceed.</p> <p>4) The Proponent should clarify the criteria used to determine where limiting sensory disturbance is feasible and where it is not.</p> <p>5) The Proponent should clarify whether safety concerns for personnel are the only situation in which limiting disturbance may not be possible.</p> <p>6) The Proponent should clarify if there are any financial or operational considerations involved in the decision whether to limit disturbance.</p> <p>7) The Proponent should clarify how lead caribou will be detected and identified (i.e., what criteria), including what monitoring is proposed to effectively achieve this.</p> <p>8) The Proponent should clarify the number of observed caribou needed to trigger the lead caribou measure.</p> <p>9) The Proponent should clarify if the Project's road will be completely closed to traffic to facilitate lead caribou to cross. This includes temporal information and how this mitigation be implemented.</p> <p>10) The Proponent should define "non-essential."</p>	
	<p>Table 1 – Commitment #64</p> <p>11) The Proponent should provide details of the interim Project Protection Zones and measures that were intended to be in place by April 2023. If these zones have not been established, the Proponent should provide information as to when are they expected to be available to reviewers of the IS Addendum.</p> <p>12) The Proponent should clarify the details of the blasting restrictions (e.g., the distance and caribou group size thresholds).</p> <p>13) The Proponent should define "essential mining activities" with respect to Deposit 1.</p> <p>14) The Proponent should clarify where else, apart from the mine site at Deposit 1, blasting</p>	Technical Comment

IR #	Information Request	NIRB Direction
	<p>would occur during the SOP2 project and be subject to this restriction.</p> <p>15) The Proponent should provide details of these helicopter operation restrictions, including distance thresholds.</p> <p>16) The Proponent should provide details on what “heightened measures” entails and the number of caribou which trigger these heightened measures.</p> <p>17) The Proponent should clarify if any mitigations restricting or stopping hauling of ore along the Tote Road have been put in place for caribou.</p>	
	<p>Table 2 – Commitment #14</p> <p>18) The Proponent should provide details of the interim measures that have been developed in response to this commitment, in particular caribou group size and distance thresholds that will trigger suspension of Tote Road haul traffic (one of the activities listed under this commitment).</p>	Technical Comment
GN # IR13	1) Please include references to all of the years archaeological work has been carried out for the Mary River Project;	IR-provide information/clarification without updating section 1.1.1
	3) Work closely with the project archaeologist to update the information provided in this section.	Technical Comment
Government of Canada		
Gov of Can IR #1	GC requests that the Proponent provide a brief Memo containing further details on the introduced changes in the assessment of cumulative effects made to fulfill the commitments made at the CEA Framework Workshop.	Technical Comment

IR #	Information Request	NIRB Direction
Crown-Indigenous Relations and Northern Affairs Canada		
CIRNAC IR #1	2. Additional information to understand the predicted SOP2 project effects related to the following technical data, information and/or modelling:	Technical Comment
	Interim Closure and Reclamation Plan (ICRP) - A description of the progressive sequence and placement of waste rock, based on SOP2 Mine Plan. - Waste Rock Stockpile Water Quality Modelling to predict As, Cu, Pb, Ni and Zn concentrations, based on the SOP2 rate or production. - Current aerial photos. - Contact Water Quality predictions using current mine monitoring data (rather than only modeled data). - Climate change model for permafrost as sole mitigation strategy with current understanding of climate change impacts in the Arctic.	
	Life of Mine Waste Rock Management Plan - Description of waste rock volume estimations and PAG identification approach so that long term waste rock management can be understood based on the SOP2 rate of production, in alignment with the Phase 1 Waste Rock Management Plan (WRMP). - An update for waste rock placement strategy to correspond to strategy presented in the ICRP and Phase 1 WRMP - datasets for the WRF and include the associated climate change model (data, assumptions).	
Fisheries and Oceans Canada		
DFO IR #1	1) Provide a table of past Technical comments (ERP (2013), PIP (2018), PIPE (2020), PIP Renewal (2022), and SOP (2022)) and describe how these comments were addressed.	Technical Comment
	2) Describe how monitoring results have informed the proposed project; Specifically	

IR #	Information Request	NIRB Direction
	include issues with non-indigenous species identification, narwhal monitoring and improvement to monitoring plans, and adaptive management as raised in comments to annual reports.	
	3) Describe how discussion and consultation, including the Marine Environment Working Group, have informed the development of monitoring plans and adaptive management; Specifically, provide a table of action items and issues raised during MEWG meetings and describe how they were addressed.	
DFO IR #3	1) Provide a table with comments on transboundary impact from DFO and Greenland for phase 2 and provide information on how they were addressed for SOP2s.	Technical Comment
DFO IR #4	Requests the Proponent provide details on their three-year cycle monitoring plan: <ul style="list-style-type: none"> • What contingencies will be undertaken if the aerial surveys are not completed or do not occur when Narwhal are in the Sound; • How the plan will be modified if local Narwhal populations decline; • How the plan will incorporate cumulative effects; and • How lower frequency surveys will capture potential changes in Narwhal distributions and availability to local harvest over the extended shipping operations and how this reduced data will be responsive to Inuit concerns of changed Narwhal use and distributions? 	Technical Comment
Health Canada		
HC IR #1	2) Isopleth mapping for 1-hour, 24-hour, and annual averaging times for NO ₂ and SO ₂ , including contour lines for health- based and other standards/guidelines used.	Technical Comment

IR #	Information Request	NIRB Direction
	3) Updated 24-hour and annual isopleth maps for PM2.5 to include a contour line for appropriate health-based and other standards/guidelines.	Technical Comment
	4) A comparison of total and incremental results to the CAAQS and the World Health Organization's standards, where appropriate. This could be achieved as part of a multi- pathway Human Health Risk Assessment.	Technical Comment
HC IR #3	1) Provide an updated Risk Communication Strategy (provided updates have been made since the 2023 version to incorporate previous feedback).	Technical Comment
	2) A comprehensive multi-pathway HHRA and an updated FEIS with stand-alone conclusions to allow for greater review and engagement by Stakeholders. This could include an update to the IS Addendum's executive and plain language summaries.	Technical Comment
Government of Greenland		
Government of Greenland	The Ministry hopes that Baffinland's SOP2 project henceforth will incorporate a more thorough definition of the term transboundary in the coming Espoo report.	Technical Comment
Igloolik and Sanirajak Hunters and Trappers Associations		
I&S HTA IR #1	a) Will this updated baseline research be used to update mitigation measures and management plans? If so, how?	Technical Comment
	b) Has Baffinland observed any ecological trends as a result of this research? Were these trends identified and addressed in the original EIS for the southern shipping components?	Technical Comment
I&S HTA IR #2	a) Will similar mitigation measures be developed in consultation with Igloolik and Sanirajak for the southern shipping components?	Technical Comment
I&S HTA IR #4	b) How will HTAs meaningfully participate in the review of Baffinland's updated management plans?	Technical Comment

IR #	Information Request	NIRB Direction
Mittimatalik Hunters and Trappers Organization		
IR #1 to Baffinland and QIA	Requests that Baffinland and QIA provide a timeline and specific instructions on how Inuit-led community-based research and monitoring can be included on the finalized list of marine monitoring programs during the proposed SOP2 period.	Technical Comment

APPENDIX B – NIRB'S INFORMATION REQUESTS TO BAFFINLAND

IR #	Subject Topic	Reference	Issue/Concern	Information Request
NIRB-01	Spatial boundaries of shipping activities	Sections 6.2 and 6.11.2.2; Attachment 4.2	Spatial boundaries of the shipping activities do not appear to be included in the <i>SOP2 IS Addendum</i> .	Please provide a location of the spatial boundaries associated with the continued shipping activities to assist in determining the Project's potential impacts on the particular biophysical or social phenomenon being addressed in the IS Addendum.
NIRB-02	Longer term strategic implications of the Project related to transportation networks (existing and proposed)	Section 2.1, pages 29-37	The NIRB was unable to identify where discussions were included on the longer term strategic implications of the Project, and how it may affect or lend to transportation networks (existing and proposed) in Nunavut, as the SOP2 proposal may assist in creating a transportation network in the summers for other vessels to transit through.	Please provide a summary of the longer term strategic implications of the Project and how it may affect or lend to transportation networks (existing and proposed) in Nunavut. If this information was provided in the IS Addendum, please reference the section.
NIRB-03	Future users of the Local Study Area (LSA), Regional Study Area	Section 2.1, pages 29-37	Information regarding future users of the LSA, RSA and project infrastructure do not appear to be provided in the SOP2.	Can Baffinland provide a summary and/or location to where in the IS Addendum it has identified future users of

IR #	Subject Topic	Reference	Issue/Concern	Information Request
	(RSA) and the Project Infrastructure			the LSA, RSA and Project Infrastructure, including commercial, government, public and private, especially the use of the Milne Inlet Port by future users.
NIRB-04	Public consultation and Inuit Knowledge - Presentation of traditional knowledge (TK) collected related to coastal areas and ice conditions	Sections 10.1.9, 11.1.0, 11.1.13 and Attachment 3.2	The NIRB notes that information presented in Attachment 3.2 was collected prior to 2018. As the proposed SOP2 is to continue shipping through the Northern Transportation Route, the NIRB would like to understand where inclusion of updated TK was included.	Please provide a summary of how TK collected during monitoring was incorporated in the SOP2 project proposal. Can Baffinland also state if additional TK was collected related to coastal areas and ice conditions since 2018.
NIRB-05	Public consultation and Inuit Knowledge - Presentation of information resulting from community Inuit Qaujimagatuqangit studies regarding identified Valued Ecosystem Components (VECs)	Sections 4.3, 10.1 and 18	The NIRB was unable to locate where discussion was provided in the IS Addendum about selected VECs from community Inuit Qaujimagatuqangit studies including: the relative seasonal and annual trends in abundance and distributions; the estimated productive capacity; migratory patterns and associated corridors/routes; critical habitats on	Please provide a summary on how monitoring data resulting from community Inuit Qaujimagatuqangit studies were incorporated in the VECs including the relative seasonal and annual trends in abundance and distributions; the estimated productive capacity; migratory patterns and associated

IR #	Subject Topic	Reference	Issue/Concern	Information Request
			or in proximity of shipping routes; and sensitive periods.	corridors/routes; critical habitats on or in proximity of shipping routes; and sensitive periods.
NIRB-06	Reference to documents that are specific to Phase 2 Proposal	Attachment 5.1	The Proponent refers to Attachment 5.1 for the design and application of multiple scenarios on impact assessment; however, Attachment 5.1 is specific to the Phase 2 proposal and not the SOP2.	Can Baffinland confirm that this is the correct diagram in Attachment 5.1 since it references the Phase 2 Development Proposal.
NIRB-07	Procedures for managing and mitigating potential spillage of ore fines on the Tote Road and at the Milne Inlet Port Site	Section 2.3.11	The NIRB could not find information on mitigating potential spillage of ore fines on the Tote Road within the IS Addendum.	Can Baffinland identify which management plan (and version) that discusses the mitigation measures in place for potential spillage of iron ore fines on the Tote Road.
NIRB-08	Tote Road operation and maintenance	Section 2.3	The NIRB was unable to locate information about the ongoing maintenance of the Tote Road for the duration of the SOP2 proposal.	Can Baffinland identify which management plan (and version) that describes the ongoing maintenance planned for the Tote Road for the duration of the SOP2 proposal.
NIRB-09	Baseline information collection from other literature and reports	Section 18	Baffinland only provided references in the IS Addendum and it is not clear how this recent baseline	Please describe how did Baffinland validated the baseline section(s) in the IS Addendum? How did

IR #	Subject Topic	Reference	Issue/Concern	Information Request
			information from the Baffin region was incorporated.	Baffinland use monitoring data?
NIRB-10	Identify natural fluctuations, trends, and cyclical and other recurrent phenomena to baseline data	Sections 4, 7 through 11	Baffinland has collected information on operations of the Mary River Project since 2014 related to natural fluctuations, trends, and cyclical and other recurrent phenomena in the region.	Can Baffinland summarize how it included monitoring data into the verification of 2014 data for the SOP2 IS Addendum? Specifically, applied to identify natural fluctuations, trends, and cyclical and other recurrent phenomena.
NIRB-11	The effect on capacity of resources to meet present and future needs	Sections 6.10, 7 through 11	The NIRB is unable to locate information regarding how the effect on capacity of resources to meet present and future needs as part of the Significant Determination for the Impacts Statement Addendum.	Can Baffinland describe where consideration of the effect of capacity of resources to meet present and future needs was applied in Significance Determination.
NIRB-12	Potential impacts to natural drainage patterns from operation of mine facilities		The NIRB was unable to locate information related to impact to natural drainage patterns from operation of mine facilities.	Can Baffinland provide a summary of where the potential impacts to natural drainage patterns from the operation of the mine facilities including the Tote Road and the Milne Inlet Port was included in the IS Addendum for the proposed SOP2.

IR #	Subject Topic	Reference	Issue/Concern	Information Request
NIRB-13	Potential impacts of ongoing exploration activities on surface water quality		The combined effects of ongoing exploration on surface water quality and the proposed ongoing shipping of the ore as proposed for the SOP2 needs to be considered as part of the IS Addendum.	Can Baffinland provide a summary on where it described the potential impacts of ongoing exploration activities on surface water quality combined with the potential effects of the proposed shipping for the SOP2 project proposal.
NIRB-14	Relationship between permafrost processes and active layer, surface waterbodies and topography	Section 9.1.1.2	A discussion on the relationship between permafrost processes and active layers, surface water bodies and topography does not appear to be included within the IS Addendum. This would be included to determine the potential impacts from the ongoing shipping through the Northern Transportation Route and the continued use of the Tote Road to Milne Inlet Port.	Please provide a summary of where the relationship between permafrost processes and active layers, surface water bodies, and topography for the Tote Road and the Milne Inlet Port as it is being proposed to be used for at least the next eight (8) years for the proposed SOP2 was considered.

IR #	Subject Topic	Reference	Issue/Concern	Information Request
NIRB-15	Details regarding the suitability of topsoil and overburden for use in the re-vegetation of surface-disturbed areas	Sections 4.3, 8.1.1 and 8.1.3	Within the IS Addendum, Baffinland noted that as the SOP2 proposal does not involve any new Project Development areas, and that information on current conditions for landforms, soil and permafrost can be found in the 2023 NIRB Annual Report.	Please provide the Document ID number for materials/ reports <i>etc</i> that Baffinland is referencing on the NIRB's Public Registry to describe the current conditions for landforms, soil, and permafrost.
NIRB-16	Discussion of the potential for soil erosion, including stream bank erosion, resulting from surface disturbances associated with the construction, operation, and maintenance of Project components	Sections 7.2.1, 7.3.3, 8.7 and 9.2.2	The Proponent stated that no new construction would be required for SOP2 and therefore discussions related to soil erosion and stream bank erosion were not included in the IS Addendum. The NIRB notes that even though the SOP2 proposed activities do not include new construction, information is not limited to construction activities but also include operations and maintenance activities.	As the Proponent is monitoring through the operation and maintenance of the Mary River Components, can Baffinland summarize what it would be using related to all erosion events in the SOP2 project proposal should the proposal be approved?

IR #	Subject Topic	Reference	Issue/Concern	Information Request
NIRB-17	Details regarding vegetation species that are valuable for cultural reasons known to Inuit	Section 8.1.7	In review of the IS Addendum, information was not located regarding the vegetation species that are valuable for cultural reasons known to Inuit. As noted previously, the NIRB understands that the SOP2 proposal is not proposing any new construction but would be a continuation of an existing amendment until 2032 and therefore Baffinland would be monitoring vegetation, including vegetation species that are valuable for cultural reasons known to Inuit.	Can Baffinland provide a summary of where it discussed vegetation species that are valuable for cultural reasons known to Inuit and/or how it updated and/or validated data used for the SOP2 proposed? Please include where mitigation and monitoring plans (version) that would be used for SOP2 if approved.
NIRB-18	Assessment of the potential loss, disturbance and/or changes to vegetation abundance	Sections 8.1.3, 8.2.3 and 8.5	As the Mary River Project is in operations and the proposed SOP2 would continue until 2032, it is important to understand the assessment of the potential loss, disturbance and/or changes to vegetation abundance that have been observed since the start of operations. This includes consultation conducted to find out how Inuit are perceiving the	Can Baffinland summarize where it discusses the assessment of potential loss, disturbance and/or changes to vegetation (including species that are of importance to Inuit culturally and traditionally).

IR #	Subject Topic	Reference	Issue/Concern	Information Request
			potential effects of the project on vegetation.	
NIRB-19	Potential impacts on wildlife from vehicle traffic on the Tote Road year-round	Sections 8.2.5, 8.2.6, 8.3.5, 8.3.6 and 8.3.8	As the proposed SOP2 would be looking at extending the timeline of transportation, it is important to understand how potential impacts on caribou recovery from very low abundance as influenced by the filter/barrier effects of the physical road structure and road traffic on movement and migration. Additionally, information on direct and indirect loss of habitat, the conduct of project activities, and associated sensory disturbances and dust fall accumulation on forage resulting from anthropogenic sources are important.	Can Baffinland summarize where the potential impacts on wildlife from vehicle traffic along the Tote Road associated with the SOP2 proposal are described?
NIRB-20	Potential impacts on wildlife from injury or mortality caused by Project activities, including intentional killing to defend human life or property	Sections 8.2.5 and 8.2.6	It did not appear that the IS Addendum had information on impacts to wildlife, particularly the use of the Tote Road, mine hauling roads, and other access roads associated with the proposed SOP2, as Project infrastructure would continue to be in operation until at	Baffinland should summarize how it incorporated the potential impacts on wildlife from injury or mortality caused by Project activities from the use of the Tote Road, mine hauling roads, and other access roads, as well as information

IR #	Subject Topic	Reference	Issue/Concern	Information Request
			least 2032 and potentially longer for the proposal.	on intentional killing of wildlife to defend the human life or property by mine personal into the SOP2 proposal.
NIRB-21	Assessment of potential contaminant loading in sea water and ice from dust plume settlement at the port site	Sections 10.2.2 and 10.2.3	The NIRB was unable to locate information about the potential contaminant loading in sea water and ice from dust plume settlement at the Milne Port site in the IS Addendum. As the proposed SOP2 would be continuing until at least 2032, it is important to identify if there would be any effects from extending the use of the Milne Inlet Port site for shipping of iron ore, as well as transportation of iron ore to the port site.	Please provide a summary of potential contaminant loading in sea water and ice from dust plume settlement at the port site from the transportation and offloading of iron ore for the SOP2 proposal.

APPENDIX C – FORMAT FOR PARTIES’ TECHNICAL REVIEW COMMENTS
DUE OCTOBER 31, 2024

Parties should use the tabular presentation below to organizing comment submissions and are requested to provide technical review comments in a fully functional, electronically searchable Word or Excel version and an unlocked PDF no larger than 25MB.

For each issue raised, parties are to include a clear reference to the IS Addendum, document section, and/or page number in the IS Addendum where the relevant information may be found. Parties may find efficiencies in structuring submissions by issue, and are asked, where possible, to align their submission in accordance with the ordering of materials as presented within the IS Addendum. Submissions may also address any other matter that the party considers relevant to the NIRB’s review of the IS Addendum and the “Sustaining Operations Proposal 2” project proposal.

1. Summary of Recommendations

Review Comment Number	
Subject/Topic	
References to the IS Addendum (i.e., section/sub-section, page number, supporting document/ Addendum number etc.)	
Summary (include Proponent’s conclusion if relevant and conclusions of commenting party)	
Importance of issue to impact assessment	
Detailed Review Comment	1. Gap/Issue 2. Disagreement with IS Addendum conclusion 3. Reasons for disagreement with IS Addendum conclusion
Recommendation/Request	

Technical review comment submissions must also contain the following:

- 1. Table of Contents** - with sections related to the main headings of the IS Addendum which identify the issues the party intends to bring forward.
- 2. Executive Summary** - Submissions must contain a non-technical executive summary of the major issues identified during the review of the IS Addendum. The summary should not exceed two (2) pages and available in English, Inuktitut, and French.