

**Table 1: Baffinland Responses to Sustaining Operations 2 Proposal Information Requests**

IR #	Reviewer's Comment	Baffinland's Response
MHTO IR 01	<p>The MHTO and partners have developed community-based, Inuit-led research programs to assist with management and decision making regarding Baffinland shipping impacts on marine wildlife of importance to residents of Pond Inlet. Baffinland and QIA have committed to “jointly approve with the QIA the adaptive management components of the SOP2 that relate to narwhal and seals through a bilateral Adaptive Management Plan Working Group (Marine Monitoring Plan p. 14).</p> <p>I understand that implementation and monitoring of the Adaptive Management Plan will be based upon ongoing inputs from the Marine Monitoring Plan (Shipping and Marine Wildlife Management Plan; p 18, Table 2.2) which is updated and finalized periodically by Baffinland and QIA. The draft list of monitoring programs described (Marine Monitoring Plan p. 50, Table 3.8) does not currently include Inuit-led or community based research and monitoring programs.</p> <p>MHTO Board of Directors 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.</p>	<p>There are multiple opportunities for Baffinland and QIA to consider and integrate the outcomes of Inuit-led monitoring into its own Environmental Management System (EMS). The specifics and details of timing and integration will be dependent on the individual programs that are being run, Baffinland’s ability to access the information (i.e. if and when the information is shared with Baffinland), and whether the monitoring program is specific to Project related impacts. Baffinland welcomes the opportunity to integrate Inuit-led monitoring programs that do not currently occur under its own EMS following receipt and discussion of this information.</p> <p>Baffinland encourages members of the Marine Environment Working Group (MEWG), which includes the MHTO, to provide details of studies conducted within or adjacent to the marine Regional Study Area (RSA). The draft revised Terms of Reference for the MEWG contain multiple references to community-based monitoring or programs to enhance the inclusion of community information and input into Baffinland’s marine monitoring and management activities. Baffinland will consider and refer to this information as it is shared by Inuit in its review and analysis of the appropriate related monitoring programs. Such information could be included in annual monitoring reports, the NIRB annual report and/or discussed in MEWG meetings and the Annual Project Review Forum.</p> <p>The Inuit Impact Benefit Agreement (IIBA) provides opportunities to support Inuit-led community-based monitoring explicitly through Article 17 and encourages the MHTO to access resources available to them through this important mechanism.</p> <p>The QIA administered Inuit Stewardship Program (ISP) is also expected to consider and integrate the outcomes of Inuit-led monitoring with additional details best provided by the QIA.</p>

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		<p>Baffinland is also always pleased to meet bilaterally with MHTO on this topic. Without a more detailed understanding the scope and timing as to what programs the MHTO already conducts, or plans to conduct in the future, it is difficult to commit to a specific timeline or provide further information for the inclusion of community-based programs in Baffinland's marine based management plans. Baffinland encourages the MHTO to share any available information they may have.</p>
IHTA/ SHTA IR 01	<p>On page 124 of the main document, the proponent lists updated baseline work that has been carried out since 2020 related to the southern shipping components of the project, including the proposed port/rail to Steensby Inlet</p> <p>a) Will this updated baseline research be used to update mitigation measures and management plans? If so, how?</p> <p>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?</p>	<p>a) Yes. The updated information will be used to update mitigation measures and management plans. Information collected since 2020 through environmental field programs in the areas south of the mine site (will be used as a basis to expand existing monitoring programs or develop new monitoring programs and mitigation measures as required prior to construction of the approved Project components that have not yet been built. Updated baseline or existing conditions information (based on IQ and western science) can be used to potentially update the characterization of the settings, the spatial and temporal extent of monitoring programs, modified or additional mitigations, modifications to trigger, action and response plans (TARP's), and more. These comprehensive updates will also be based on engagement with communities, working groups and regulators.</p> <p>Once these updates are complete, the updated mitigation and management plans will be submitted to NIRB and will be subject to public review and comment (this is an established process that NIRB regularly undertakes in relation to updates to mitigation and monitoring plans required under Project Certificates).</p>

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		<p>b) The ecological trends observed as a result of the updated baseline work carried out since 2020 were generally identified and addressed in the 2012 FEIS and are consistent with its findings. The additional information from the marine environment sampling aerial ice surveys and bathymetric surveys have provided information for the detailed site-specific construction authorization requirements, as well as project planning. Baffinland will continue to provide the final reports of environmental field programs required under the Project Certificate through the annual report to NIRB, as has been done to date.</p>
IHTA/ SHTA IR 02	<p>On page 289 of the main document, Baffinland lists mitigation measures for marine shipping, allegedly based on Inuit Qaujimagatuqangit and developed with Inuit in Pond Inlet.</p> <p>Questions:</p> <p>a) Will similar mitigation measures be developed in consultation with Igloodik and Sanirajak for the southern shipping components?</p> <p style="padding-left: 40px;">b. Provide more details regarding how IQ influenced these mitigation measures.</p>	<p>It appears these questions are based on SOP2 Addendum, Section 10.3.1, SMWMP Mitigation Measures, starting at page 289: <i>"The SMWMP includes a series of complementary mitigation measures that aim to reduce and/or avoid adverse impacts on marine mammals as a result of shipping, the majority of which have been developed directly with Inuit in Pond Inlet through various IQ gathering exercises and annual general engagement activities."</i></p> <p>a) Yes, Baffinland will work directly with Igloodik and Sanirajak to review shipping related management plans, inclusive of mitigation measures, applicable to the southern shipping components.</p> <p>b) The mitigation measures developed for the Northern Transportation Corridor have evolved over time through learnings and experience with the operation. It is Baffinland's expectation that similar experiences will occur through the Southern Transportation Corridor. In general, there are a number of ways IQ has been used to influence monitoring and mitigations for the Project. In early studies before the Project was in operation, IQ was used to identify areas and topics of importance for monitoring (e.g. the need for shore based monitoring of narwhal in Milne Inlet). It was also used to identify community perceptions</p>

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		<p>regarding risk that Baffinland should consider in the development of mitigation measures. During Project operations IQ and Inuit engagement have been used to expand the spatial boundaries of what is monitored (e.g. Ragged Island was included in monitoring); and to develop new mitigation measures (e.g. we heard that too many ships were floating in Eclipse Sound in the early years of the Project so we made a rule that at most only three Project ships could be at Ragged Island). The influence of IQ is used to better understand Project effects from the local Inuit lens and develop an acceptable solution to reduce or offset those impacts. Baffinland understands that it cannot offset all impacts of the Project, therefore it is a requirement under the Nunavut Agreement to have in place an Inuit Impact Benefit Agreement with the QIA.</p> <p>Baffinland's current list of mitigation measures related to marine shipping via Milne Port have been developed and refined through a number of sources, including but not limited to formal IQ studies, regulatory reviews and ongoing community engagement. For further details, these sources are covered in detail in Chapter 3 of the SOP2 FEIS Addendum.</p>
IHTA/ SHTA IR 03	<p>On page 191 of the main document, Baffinland states that construction of the Steensby port/rail will commence in 2024. Elsewhere, Baffinland states that construction will commence once funding has been secured.</p> <p>Questions:</p> <p style="margin-left: 40px;">a) Clarify when construction will commence for the Steensby port/rail.</p>	<p>The reference to 2024 is a typo. It is not currently known precisely when construction will commence for these components but it is expected to occur over a 3 to 4 year period (per the 2012 FEIS). Specific timing will depend on various factors including financing and a formal construction decision by Baffinland.</p>

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IHTA/ SHTA IR 04	<p>On page 114 of the main document, Baffinland states that management plans will be updated to incorporate relevant Steensby activities and infrastructure. According to Baffinland, these updates will be done as part of the NIRB annual reporting process. However, HTAs and the public at large rarely participate in NIRB annual reporting due to a lack of technical capacity.</p> <p>Questions:</p> <p>a) Will management plans be updated prior to the commencement of construction of the Steensby port/rail?</p> <p>b) How will HTAs meaningfully participate in the review of Baffinland's updated management plans?</p>	<p>a. Yes, plans for the relevant activities will be updated following the NIRB plan update process before these activities are undertaken.</p> <p>b. See Baffinland's response to IHTA/ SHTA IR 02 for additional detail on the process planned to review shipping related management plans together with Sanirajak and Igloodik. A similar process will be carried out for terrestrial management plans as well. It is expected the details of this process will be further discussed and identified through our ongoing engagement with Sanirajak and Igloodik, based on your feedback.</p> <p>With respect to the public process relating to the review of Baffinland's updated management plans, the NIRB process is designed and intended to facilitate access by Inuit, including HTAs. HTAs are included on the NIRB's distribution list for the Project and will be publicly notified of the review process. Feedback shared through the NIRB process is considered by all participants, including Baffinland. Baffinland responds to this feedback as appropriate, including via plan updates and where feedback is not incorporated, written rationale. NIRB also issues recommendations to Baffinland based on all feedback received through the review process.</p> <p>HTAs will also participate in the review of Baffinland's plans through continued direct engagement with Baffinland as well as through the Marine and Terrestrial Environment Working Groups, where each HTA has representation funded by Baffinland.</p> <p>It is expected that HTAs that are interested in obtaining support from technical consultants will do so, but technical expertise is not required in order to participate in NIRB annual reporting and other Proponent-led activities aimed at integrating community knowledge.</p>
QIA IR 01	Mary River Project – Sustaining Operations Proposal 2, Section 2.5, Evaluation of Alternatives	<p>a. The methods used to identify and evaluate alternatives is set out in the SOP 2 Addendum, Section 2.5 "Alternatives", Page 50. These methods</p>

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	<p>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.</p> <ul style="list-style-type: none"> <li>a. Please describe the methods used to identify and evaluate alternatives to the Project.</li> <li>b. Please also identify whether and how the Tusaqtavut Studies and other available sources of Inuit Qaujimajatuqangit were used to objectively evaluate the advantages and disadvantages of all proposed alternatives for Inuit rights, culture, resources, and land use</li> </ul>	<p>are consistent with those used in the original FEIS (Volume 3, Section 6.1) and carried forward since.</p> <ul style="list-style-type: none"> <li>b. Three alternative options were considered (Reverting to Early Revenue Phase Transportation Limits (Option 1), Continued Northern Transportation Corridor operation at 6 Mtpa (Option 2), Care and Maintenance (Option 3). One of the four factors explicitly considered in evaluating each alternative option was "Community Acceptability".</li> </ul> <p>Option 1 was previously assessed by NIRB via the Early Revenue Phase and approved by the issuance of Project Certificate Amendment No. 1. Inuit views were considered through the NIRB process.</p> <p>As part of considering Inuit views on Option 3 and the negative impact this may have on Inuit communities, Baffinland took into account that Inuit have expressed the desire for the Project to continue operations to ensure financial and employment benefits.</p> <p>The community and environmental acceptability of the preferred Option 2 (SOP2) is further considered through the detailed assessments contained in the SOP2 FEIS Addendum.</p> <p>IQ and the information from the Tusaqtavut Studies was considered in each of the VC Assessments found in Chapters 7-11 of the SOP2 FEIS Addendum, including in the Chapter 11 assessment of potential SOP2, combined and cumulative effects on culture, resources and land use (see for example Section 11.1.9 at page 187 "Inuit Culture, Resources and Land Use" which includes an extensive quote from the Pond Inlet Tusaqtavut Study).</p> <p>Section 6.4 at page 135-136 explains the SOP2 Addendum approach to the topic of Inuit rights in general:</p>

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		<p><i>“Through the assistance provided by the previous development of NIRB Guidelines for the Project and the additional feedback provided through direct consultations and the CEA Framework Workshop, VCs for this Addendum were expanded based on species/topics that are indirectly and directly related to Inuit rights practices.</i></p> <p><i>Inuit rights was not included as a separate stand-alone VC, but the topic of Inuit rights was specifically integrated, where applicable as part of how a VC was viewed, interpreted and considered. The assessment of the VCs and pathways for SOP2 considers potential for related impacts on rights associated with those VCs pursuant to the Nunavut Agreement and section 35 of the Constitution Act, in particular on the potential for impacts on exercise of wildlife harvesting rights and use of lands and waters. If Inuit identified potential impacts to them in relation to a particular VC, this was treated as an item of priority concern and focus that required carry through in the assessment. Specifically, where Inuit have identified potential for related impacts on or interference with rights (in particular, where Inuit groups or community members indicate there is potential for interference), additional mitigations are given consideration and where appropriate, applied. These factors are considered as part of the residual, combined, and cumulative effects analyses.</i></p> <p><i>The SOP2 Addendum provides conclusions on potential for impacts on each VC based on IQ and other community input shared with Baffinland, operational and monitoring information, best available western science and the assessment conclusions on related topics, taking into account applicable mitigations. These conclusions reflect the professional experience perspective</i></p>

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		<p><i>of the individuals that carried out the SOP2 assessment, taking into account all of the information shared with Baffinland by Inuit and otherwise made available to them. Again, it is acknowledged that only Inuit can apply an "Inuit lens". As a next step, many Inuit and Inuit organizations will have written and oral opportunities via the NIRB SOP2 reconsideration process to share their own perspectives on SOP2 Addendum conclusions about VCs that may directly or indirectly link to rights-based related topics."</i></p>
QIA IR 02	<p>Mary River Project – Sustaining Operations Proposal 2, Section 3.2, Summary of Baffinland's Approach to Inuit Engagement</p> <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. 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</p>	<p>Baffinland reviewed Section 3.2, "Summary of Baffinland's Approach to Inuit Engagement" in relation to these comments, which we hope provides clarity on the approach to quantitative and qualitative analysis.</p> <ul style="list-style-type: none"> <li>• First, the tables in Section 3.2 present feedback received through engagements and do not include any additional subjective commentary. See for example, Table 3.8 ("Summary of Feedback from Pond Inlet on SOP and SOP2") on page 88.</li> <li>• Second, in reference to the use of the word "many" on page 73, "<i>Through written comment submissions and during the Community Roundtables, support for the PIP Renewal and SOP was expressed by many interested parties in recognition of the level of economic benefits associated with the continuing transportation levels and negative economic impacts associated with reverting to the ERP operation (Table 3.6).</i>" The detail supporting this statement is listed separately at Table 3.6, which includes 15 past letters of support from local businesses, Hamlets and HTOs. Baffinland believes it is reasonable to describe that number of letters as "many", in the context of the North Baffin region, but we also appreciate others may disagree with that assessment.</li> </ul>

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	<p>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> <p>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.</p>	<ul style="list-style-type: none"> <li>Third, the reference to the use of the word “some” on page 74 does not relate to either support or opposition for the project, but instead relays a procedural concern that NIRB originally identified in its report: <i>“As part of the SOP review, some interested parties noted challenges associated with the short-term modification proposals to the Mary River Project, and the review of new applications for modifications to the Project being prepared on an annual and/or expedited basis (NIRB 2023).”</i></li> </ul> <p>As stated at page ix of the 2023 NIRB report referenced “several” parties as support for that statement, <i>“Several parties noted the challenges that repeated short-term (2 years or less) modification proposals to the Mary River Project create for the regulatory process, as it is difficult to assess and monitor the effects of the previous modification (including cumulative effects) when new applications for modifications to the Project are being received on an annual/expedited basis.”</i></p> <p>Baffinland does not believe there is a material difference between the meaning of “some” and “several”.</p> <ul style="list-style-type: none"> <li>As for a summary of Baffinland’s qualitative and quantitative assessment of comments received and how it was incorporated in the Addendum, see response to QIA IR 03 to QIA IR 07.</li> </ul>
QIA IR 03	<p>Mary River Project – Sustaining Operations Proposal 2, Section 3.2, Summary of Baffinland’s Approach to Inuit Engagement</p> <p>Table 3.5 “Summary of Key Engagement Outcomes” lists positive outcomes from engagement but does not present outstanding concerns.</p>	<p>Per the introduction to Table 3.5, the table is intended to provide <i>“A general description of key engagements specific to recent applications (PIP, PIPE, PIP Renewal, SOP) and most recent SOP2 is provided below for additional context on how proposed activities and mitigations for SOP2 have been shaped by feedback and ongoing operational learnings. A summary of Key Engagement Outcomes on key topics of interest is provided in Table 3.5 in addition to a more comprehensive review provided in Sections 6 through 11 based on VCs”</i>. Baffinland did not focus only on positive outcomes in drafting this table – for</p>

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	<p>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.</p>	<p>example, the table acknowledges that concerns were raised on potential effect of noise on marine mammals.</p> <p>Outstanding concerns are also explicitly acknowledged and addressed in a different section of Chapter 3. Section 3.2.3.4 (starting at page 87) provides a summary of feedback heard from Inuit from North Baffin communities during engagement activities held by Baffinland specific to the SOP and SOP2 and existing operations.</p> <ul style="list-style-type: none"> <li>For example, see page 87, <i>“Generally, community members across North Baffin engagements shared common concerns, particularly with respect to dust management and mitigations developed for the Mary River Project (refer to subsequent sections for feedback received and responses for each community). ... It is well understood that further discussions on SOP2 are to be held within each community. Where it is noted that no questions or comments were raised on a specific topic, Baffinland does not infer that to mean that there is no interest in the topic area, or that it is not important to the community. Summaries are simply provided to report on the topics raised in a specific engagement session. Where consistent themes or topic areas are discussed or raised more often, it is inferred that this is a particular topic of interest either at the time (due to seasonality or timing for example, and/or that this is a particular area of importance or concern) or in general.”</i></li> </ul> <p>In addition to the information contained in Chapter 3, each of the VC Assessment Chapters (7 to 11) include a summary of community statements shared with Baffinland under the Existing Conditions sections. These summaries include considerations for QIA’s Tusaqtavut Studies, among other IQ and community feedback collection initiatives and is presented in the form it was generally received without reinterpretation. Much of those sections identify community concerns, which Baffinland has taken steps to help address through our existing or proposed mitigation measures and monitoring programs.</p>

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QIA IR 04	<p>Mary River Project – Sustaining Operations Proposal 2, 3.2.3.2 Summary of Engagements.</p> <p>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)</p> <p>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.</p>	<p>Baffinland’s approach to engagement is summarized within Chapter 3 and Attachment 1.1, Parts 1 to 7 (Community Engagement Records). Baffinland has developed an approach to engagement whereby engagements are predominantly conducted by Inuit and in Inuktitut. QIA is notified and invited to participate in all engagement activities at their election.</p> <p>Access to Baffinland’s entire engagement database is not required for parties to evaluate the results, responses and effectiveness of Baffinland’s engagement activities. Many parties including NIRB, the QIA and the federal government undertake their own engagements in relation to the Mary River Project and are in a position to make their own evaluations.</p> <p>Baffinland maintains that Chapter 3 and Attachment 1.1, Parts 1 to 7 (Community Engagement Records) contains sufficient detail to evaluate the results, responses and effectiveness of Baffinland’s engagement activities to date for the purpose of the SOP2 reconsideration.</p> <p>Baffinland’s Inuit led engagement team designed the SOP2 consultation programs and follows Inuit oral traditions. The Inuit individuals that led the engagements will be available to participants and NIRB staff at technical meetings and hearings to advise directly on what they heard from communities, and to answer questions and add detail if needed.</p>
QIA IR 05	<p>Mary River Project – Sustaining Operations Proposal 2, 3.2.3.2 Summary of Engagements.</p> <p>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.</p>	<p>As outlined in Section 3.2.3.2, Baffinland enters all meeting records into its StakeTracker database, where feedback received is coded by topics. The tables generated in Section 3.2.3.2 were developed by filtering feedback received for each community specific to the SOP and SOP2 engagement activities. All feedback received during engagement activities is documented either verbatim or presented as a summary of the statements shared during the events. Key topics raised during engagement activities have been included in the tables provided throughout this section.</p>

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QIA IR 06	<p>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.</p> <p>Mary River Project – Sustaining Operations Proposal 2, 3.2.3.2 Summary of Engagements</p> <p>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.</p> <p>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.</p>	<p>The feedback provided in Tables 3.8 to 3.18 is addressed directly and indirectly in the following Chapters by Topic:</p> <table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr style="background-color: #c00000; color: white;"> <th style="text-align: left;">Topic</th> <th style="text-align: left;">SOP2 FEIS Addendum Chapter</th> </tr> </thead> <tbody> <tr> <td>Project Design</td> <td style="text-align: center;">1, 2</td> </tr> <tr> <td>Engagement</td> <td style="text-align: center;">3</td> </tr> <tr> <td>Atmospheric Environment</td> <td style="text-align: center;">7</td> </tr> <tr> <td>Terrestrial Environment</td> <td style="text-align: center;">8</td> </tr> <tr> <td>Freshwater Environment</td> <td style="text-align: center;">9</td> </tr> <tr> <td>Marine Environment</td> <td style="text-align: center;">10</td> </tr> <tr> <td>Socio-Economic Environment</td> <td style="text-align: center;">11</td> </tr> </tbody> </table> <p>Of particular note, each of the VC Assessment Chapters (7 to 11) include a summary of community statements shared with Baffinland under the Existing Conditions sections. These summaries include considerations for QIA's Tusaqtavut Studies, among other IQ and community feedback collection initiatives and is presented in the form it was generally received without reinterpretation. Much of those sections identify community concerns, which Baffinland later addresses through our existing or proposed mitigation measures and monitoring programs.</p> <p>Rather than submitting revised versions of Tables 3.8 to 3.18, Baffinland suggests the QIA reviewer focus on review of Chapters 7 to 11 with reference back to Chapter 3, as the requested information is already present in the SOP2 FEIS Addendum.</p>	Topic	SOP2 FEIS Addendum Chapter	Project Design	1, 2	Engagement	3	Atmospheric Environment	7	Terrestrial Environment	8	Freshwater Environment	9	Marine Environment	10	Socio-Economic Environment	11
Topic	SOP2 FEIS Addendum Chapter																	
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QIA IR 07	<p>Mary River Project – Sustaining Operations Proposal 2, 3.2.3.2 Summary of Engagements</p> <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.</p> <p>These aspects include:</p> <ul style="list-style-type: none"> <li>• Inclusion of Inuit Knowledge, IQ and community engagement</li> <li>• Focus on Indigenous rights and experience</li> <li>• Recognition of individual communities</li> <li>• Selection of Valued Components</li> <li>• Spatial and temporal scope</li> <li>• Significance thresholds and precautionary approach</li> <li>• Consideration of climate change</li> <li>• Tallurutiup Imanga</li> <li>• Incorporating CEA in monitoring programs</li> </ul> <p>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.</p>	<p>QIA references “Section 3.2.3.2 Summary of Engagements” for this statement, but the more detailed methodology information QIA is seeking can be found at “Section 6.11.2 CEA Methods and Approach”, starting at page 149 of the SOP2 Addendum. Within this section there is sub-section 6.11.1.2 ‘Cumulative Effects Assessment Framework Workshop’ and Table 6.6, which provides a concordance between the topics and commitments Baffinland presented at the CEA Framework Workshop and the SOP2 FEIS Addendum.</p> <p>One outcome of the CEA Workshop was general support of the approach that Baffinland presented during the CEA Workshop for the SOP2 cumulative effects assessment by meeting participants, including support from QIA.</p>
QIA IR 08	<p>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</p>	<p>Cultural well-being is specifically evaluated in the SOP2 Addendum starting in Sections 11.1.11 and 11.2.11. Governance and Leadership is specifically evaluated in Sections 11.1.12 and 11.2.12.</p>

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	<p>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</p> <p>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 wellbeing.</p>	<p>Baffinland agrees that there are multiple ways in which the Project currently and would continue to contribute to the well-being and governance and leadership Valued Components. In addition to the Inuit Committee(s) (under the Inuit Stewardship Plan), the Dust Audit Committee, and the environmental working groups (under the Project Certificate), there are many other avenues where enhanced capacity for Inuit governance and leadership has the potential to positive contribute to Inuit cultural well-being. These include:</p> <ul style="list-style-type: none"> <li>• The Tasiuqtiit Working Group</li> <li>• Bi-annual third-party compliance audit (TC179(c))</li> <li>• Bi-annual compliance reports (TC189)</li> <li>• Project Monitoring</li> <li>• Mary River IIBA</li> <li>• Tallurutiup Imanga NMCA</li> <li>• Adaptive Management Plan</li> <li>• Various Inuit led studies</li> </ul> <p>A detailed summary of project oversight mechanisms is included in Chapter 16 'Project Oversight and Adaptive Management. Baffinland also encourages the QIA to work directly with the Government of Nunavut for additional information related to this topic. It is expected this will be a continued topic for discussion at the Mary River Socio-Economic Working Group or which Baffinland, QIA and the GN are all participants.</p>
QIA IR 09	<p>Mary River Project – Sustaining Operations Proposal 2, Section 6.2, Spatial and Temporal Boundaries.</p> <p>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.</p>	<p>The methodology for determining spatial boundaries is provided in SOP2 FEIS Addendum, Attachment 4.2 'FEIS Assessment Methodology', Section 3.2.1. Within that section there is also a supporting flow diagram (Figure 2-3.1), which shows conceptually how public consultation and traditional knowledge studies influenced project definitions, alternatives and spatial (PDA, LSA, RSA) boundaries.</p>

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	<p>Please explain how the spatial and geographical scope were informed by Inuit Qaujimajatuqangit or Inuit Qaujimaningit.</p>	<p>In general, draft spatial boundaries were set at the onset of the project proposal in 2008 and subject to multiple layers of review and adjustment through project specific land use studies, community engagement and the public review facilitated by NIRB between 2008 and 2012. For instance, multiple spatial boundaries were adjusted between the submission of the original DEIS in 2010 and the FEIS in 2012 (marine mammals, marine birds, etc.). Over time additional adjustments have been made to spatial boundaries based on community feedback. Most recently the caribou RSA was adjusted through HTO participation and feedback received during Terrestrial Environment Working Group meetings in advance of the 2023 aerial caribou surveys. What is provided in the SOP2 FEIS Addendum reflects the most current and largest spatial boundaries for each VC, which are based on over 16 years of continuous engagement and evolution.</p> <p>The SOP2 FEIS Addendum specifically confirms IQ information sources at Section 3.1.2.1 "Information Sources", starting at page 57, <i>"Baffinland is committed to incorporating IQ throughout all planning and operations phases of the Project. Accordingly, a number of knowledge sources have been considered for integration into the Project, extending from early planning stages to present. IQ has influenced the selection of VCs, baseline study design and implementation, definition of temporal and spatial boundary limits, Project infrastructure design and operations, and identification and implementation of mitigation and management measures, and assessment of effectiveness of potential Project-related effects through monitoring programs."</i></p> <p>The topic of how IQ influenced spatial and geographic scope is also addressed in the SOP2 Addendum at Table 3.4 "Summary of Methods of Incorporating IQ into the EIS, Project Amendments and Existing Operations", starting at page 65. See in particular the following rows:</p> <ul style="list-style-type: none"> <li>• "Baseline Reports" (top of page 65)</li> <li>• "Project Design" (top of page 65)</li> </ul>

IR #	Reviewer's Comment	Baffinland's Response
		<ul style="list-style-type: none"> <li>• "Identification/confirmation of Spatial and Temporal Boundaries (2012, 2018, 2020, 2022, 2023+)" (top of page 66).</li> </ul>
QIA IR 10	<p>Mary River Project – Sustaining Operations Proposal 2, Section 6.2, Spatial and Temporal Boundaries 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)."</p> <p>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.</p>	<p>Baffinland did include relevant information from past assessments in the FEIS Addendum to avoid cross-referencing where practicable, in the form of a summary in Section 4, as acknowledged in the information request (2012 FEIS is found at NIRB Registry IDs 285303, 285304, 285305, 285306, 285307, 285308, 285309 ; ERP FEIS Addendum found at NIRB Registry ID 290839). Baffinland appreciates some reviewers require additional detail and in those circumstances Baffinland has provided relevant references and precise NIRB Registry Numbers where possible.</p> <p>If for example all pre-existing baseline data conditions were included in the SOP2 Addendum, this would significantly increase the overall size of the document and reduce the readability of the materials. Similarly, including or attaching all previous annual monitoring reports to provide the level of detail certain Interveners may like access to for specific topics or expect to be included within the SOP2 FEIS Addendum itself would render the application entirely untenable to technically or meaningfully access.</p> <p>It is not reasonable or required to provide a full history of how each component of the SOP2 FEIS Addendum was developed within the document itself. As highlighted above, Baffinland has taken great consideration to include the most relevant information from past assessments in SOP2. To better understand how spatial boundaries, Valued Components, indicators, mitigation measures monitoring programs and other assessment components have been developed and shaped by external input over an 18 year regulatory and operations life span, it is reasonably incumbent on the reviewer to access documents that are referenced within the SOP2 FEIS Addendum. Where needed, Baffinland has provided specific section references and NIRB Registry Numbers to aid reviewers in accessing documentation that the SOP2 FEIS is based or builds on.</p>

IR #	Reviewer's Comment	Baffinland's Response												
		Per Baffinland's response to QIA IR 02 above, Baffinland would also like to clarify that it is not expected or planned to submit any revised portion of the SOP2 FEIS Addendum through the technical review. Baffinland may provide supplementary material to support the assessment but the FEIS is a final document.												
QIA IR 11	<p>Mary River Project – Sustaining Operations Proposal 2, Section 6.2, Spatial and Temporal Boundaries.</p> <p>The maps in section 6.2 are blurry and illegible.</p> <p>Please provide higher resolution maps.</p>	The SOP2 FEIS Addendum pdf document had to be compressed to meet size requirements, which has, in some instances, reduced the quality of certain figures. Standalone maps with enhanced resolution are provided as Attachment 1.1 and 1.2 of this submission.												
QIA IR 12	<p>Mary River Project – Sustaining Operations Proposal 2, Section 6.3, Scoping of Valued Components</p> <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"> <li>• Marine Hunting</li> <li>• Terrestrial Harvesting</li> <li>• Fishing and Freshwater</li> <li>• Travel, Trails, and Habitation</li> <li>• Cultural Continuity</li> </ul> <p>Please include these items as indicators in the assessment of impacts to Inuit Culture, Resources,</p>	<p>Baffinland has considered the outlined indicators in relation to multiple assessment chapters (Chapters 7 to 11) as outlined in the table below. These indicators, which were presented as Valued Components in the Tusaqtavut Studies, broadly align with the Valued Components presented by Baffinland under the terrestrial, freshwater, marine and socio-economic (under Inuit Culture, Resources and Land Use) Valued Components. The existing assessment of the Inuit Travel Route Safety and Cultural Wellbeing Valued Components already consider the information made available through the Tusaqtavut Studies related to Travel, Trails and Habitation and Cultural Continuity, respectively. There is no need to adjust any naming conventions related to the assessment as the QIA request has already been satisfied.</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr style="background-color: #c00000; color: white;"> <th style="text-align: left;">Proposed Indicator</th> <th style="text-align: left;">Related SOP2 Assessment Chapters</th> </tr> </thead> <tbody> <tr> <td>Marine Hunting</td> <td>Chapter 10, Chapter 11</td> </tr> <tr> <td>Terrestrial Harvesting</td> <td>Chapter 8, Chapter 11</td> </tr> <tr> <td>Fishing and Freshwater</td> <td>Chapter 9, Chapter 11</td> </tr> <tr> <td>Travel, Trails and Habitation</td> <td>Chapter 11</td> </tr> <tr> <td>Cultural Continuity</td> <td>Chapter 11</td> </tr> </tbody> </table> <p>Baffinland will continue to discuss topics related to Inuit Culture, Resources and Land Use bilaterally with QIA, including importantly the relationship of that topic to the QIA-administered Inuit Stewardship Program.</p>	Proposed Indicator	Related SOP2 Assessment Chapters	Marine Hunting	Chapter 10, Chapter 11	Terrestrial Harvesting	Chapter 8, Chapter 11	Fishing and Freshwater	Chapter 9, Chapter 11	Travel, Trails and Habitation	Chapter 11	Cultural Continuity	Chapter 11
Proposed Indicator	Related SOP2 Assessment Chapters													
Marine Hunting	Chapter 10, Chapter 11													
Terrestrial Harvesting	Chapter 8, Chapter 11													
Fishing and Freshwater	Chapter 9, Chapter 11													
Travel, Trails and Habitation	Chapter 11													
Cultural Continuity	Chapter 11													

IR #	Reviewer's Comment	Baffinland's Response
	<p>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.</p>	
QIA IR 13	<p>Mary River Project – Sustaining Operations Proposal 2, Section 6.3, Scoping of Valued Components</p> <p>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.</p> <p>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.</p>	<p>This assessment relies on available statements about Inuit rights shared by Inuit in a variety of venues. Baffinland's understanding is that there is a broad range of Inuit rights held by all Qikiqtani rights holders, including socioeconomic rights, harvesting rights, language rights, IQ rights, rights to carving stone.</p> <p>Baffinland's goal in our engagements is to gather feedback on whatever topics that are relevant to the Project that Inuit wish to share with us, as often as possible in a direct Inuit to Inuit setting. While Baffinland does need to engage on specific subjects in its engagements, the information is ultimately collected based on the guidance of our Inuit led engagement team given the specific circumstances of the engagement. There is risk that asking questions that are narrow (for example explicitly asking about impacts to rights, instead of asking more broad questions such as whether Inuit have any views, questions or information to share) may end up in obtaining less and/or biased feedback.</p> <p>Baffinland was mindful about the close and inter-related relationship between Inuit rights and topics of focus in the SOP2 assessment, and Inuit experience with the approved project. Specifically as the SOP2 relates to rights-based practices, is described in detail in Chapter 12 of the SOP2 FEIS Addendum. For example, when participants expressed concern about potential impacts on their ability to hunt as a result of Project effects, out of caution Baffinland proceeded in a manner that this reflects a potential "rights based" concern, even if the participants did not explicitly talk about the right to hunt together with their concerns about potential impacts on hunting and harvesting. When Inuit expressed a desire for employment and financial opportunities arising from the</p>

IR #	Reviewer's Comment	Baffinland's Response
		<p>Project, this was also understood as a topic that could relate to and impact Inuit socioeconomic rights.</p> <p>It is anticipated that in the SOP2 reconsideration, Inuit participants will advise directly on potential impacts to their rights, to the extent they wish to do so through the processes established by NIRB under the Nunavut Agreement. Furthermore, there are several Project initiatives underway to help address effects on rights and culture identified by Inuit, as described in Section 12.3 of the SOP2 FEIS Addendum.</p> <p>Baffinland included information on Inuit rights in the SOP2 Addendum at QIA's request, and understands the approach to this topic from an environmental assessment methodology perspective will continue to evolve. Building on what was included in the SOP2 FEIS Addendum and in recognition of the importance of this topic to QIA, Baffinland will continue to work with QIA and QIA technical advisors to better understand their expectations on this topic with the goal of developing potential guidance that may be applicable to future reconsiderations related to the Mary River Project, such as to add Deposits 2 and 3.</p>
QIA IR 14	<p>Mary River Project – Sustaining Operations Proposal 2, Section 6.3, Scoping of Valued Components</p> <p>Section 6.11.2.4 Other Projects and Activities does not adequately describe how past projects were researched and identified.</p> <p>Please include detailed sources for all past projects and a more detailed description of how past projects were identified.</p>	<p>The detailed references have been included in Table 6.8. Baffinland relied on the NIRB Registry to identify past projects and utilized materials on the registry to obtain project details.</p> <p>Baffinland also relied on advice shared through the CEA NIRB Workshop in February 2024, which included Inuit participants as well as Inuit organizations such as QIA.</p>
QIA IR 15	<p>Mary River Project – Sustaining Operations Proposal 2, Section 6.11, Assessment of Cumulative Effects</p>	<p>Per the references in Table 6.8, Baffinland relied on the NIRB Registry to identify past projects and utilized materials on the registry to obtain project details. Baffinland also relied on advice shared through the CEA NIRB Workshop in</p>

IR #	Reviewer's Comment	Baffinland's Response
	<p>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.</p> <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>	<p>February 2024, which included Inuit participants as well as Inuit organizations such as QIA.</p> <p>If QIA is aware of a past project that it believes is missing from the list and should be added, please advise.</p>
QIA IR 16	<p>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</p> <p>It is unclear how the key indicator(s) presented in Table 3.1 were identified.</p> <p>Please work with affected Inuit parties to identify key indicator(s) for Potential Socio-Economic Effects Resulting from Temporary Project Closure and</p>	<p>Attachment 7.2 was developed to satisfy Term and Condition 149 of Project Certificate 005 and included in the SOP2 FEIS Addendum to satisfy concordance and as background reference only. This Report is focused on key indicators and residual effects assessed for each socio-economic VC (formerly referenced as VSEC's) in the FEIS and FEIS Addendums. Key indicators are subsets of socio-economic VC's used to communicate information about the effects of the Project. The use of indicators is a pragmatic approach to conducting an effects assessment, where evaluating every potential effect on the receiving environment is not practical. Key indicators may have one or more residual effects associated with them.</p> <p>As described in the original Socio-Economic Baseline Report (FEIS, Volume 4, Appendix 4A), qualitative data gathered from community-based research</p>

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	include additional details on this the Temporary Project Closure process in the Overview section.	<p>(Community Based Research Report, FEIS, Volume 2, Appendix 2B) for the Project provide insight into the perceptions, expectations, values, concerns, and aspirations of study area residents. Analysis of this qualitative data helped to frame the issues of importance to study area residents and provided the essential structure of the socio-economic baseline report. These perceptions also set the quantitative (statistical) data in a context that allowed for better interpretation.</p> <p>Baffinland may in future make adjustments, in due course and as required, to the socio-economic risk analysis for closure. Should this occur, Baffinland would first re-engage with communities on this specific topic, as it did in the development of the current risk assessment.</p>
QIA IR 17	<p>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</p> <p>QIA notes that while tables are helpful for condensing information, detailed descriptions of cumulative effects are lacking.</p> <p>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</p>	<p>Attachment 7.2 was developed to satisfy Term and Condition 149 of Project Certificate 005 and included in the SOP2 FEIS Addendum to satisfy concordance and as background reference only. The cumulative socio-economic effects of mine closure in the communities and across the north would exacerbate the effects described in Table 3-1. The risk analysis is based on an intimate understanding of the baseline and existing conditions in the communities and those potential cumulative effects are captured to some degree in that table and in the remainder of the report.</p> <p>Baffinland may in future make adjustments, in due course and as required, to the socio-economic risk analysis for closure. At that time Baffinland may consider other examples or case studies of where potential cumulative effects have been explicitly included in a socio-economic closure risk analysis.</p>
QIA IR 18	Sustaining Operations Proposal 2, Section 13: Effects of the Environment on the Project	The requested information can be found in the Climate Change Strategy, submitted on the NIRB SOP2 Public Registry and referenced in Chapter 5, Table 5.1 with the associated NIRB Registry Number 349415. The following sections

IR #	Reviewer's Comment	Baffinland's Response
	<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 Qaujimajatuqangit 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> <p>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 Qaujimajatuqangit and Inuit perspectives will be considered.</p>	<p>and appendices are relevant to the QIA's specific request regarding the consideration of Inuit perspectives and IQ:</p> <ul style="list-style-type: none"> <li>• Strategy Development Process (Page 2)</li> <li>• Strategy Implementation Roadmaps (Page 7)</li> <li>• Appendix B: Organizations providing feedback on draft Climate Change Strategy (Page 10)</li> <li>• Appendix C: How engagement feedback was incorporated into the Climate Change Strategy (Page 12)</li> </ul> <p>Community perspectives regarding climate change, and further context relating to the Climate Change Strategy is provided within the SOP2 FEIS Addendum in Chapter 7, Section 7.1.4, "Community Statements Shared with Baffinland", starting at page 170 (reproduced below for convenience):</p> <p style="padding-left: 40px;"><i>"Baffinland's stakeholders and local communities have identified climate change as a key issue in Nunavut, with communities reporting observations of the changing climate. In May 2023 Baffinland submitted an updated Climate Change Strategy (Baffinland 2023c) to the NIRB that was informed through extensive public engagement, including the following community organizations: Municipality of Clyde River, Hall Beach HTA, Residents of Pond Inlet and SmartICE (Pond Inlet) and Ikajutit HTO. From July to November 2021, Stratos (the consultant engaged by Baffinland) conducted interviews with Inuit, governments, and other interested organizations / groups to discuss the draft Strategy. Through these interviews, Stratos and Baffinland gained substantial feedback and input on how the Strategy could contribute to greenhouse gas emissions management, support climate change adaptation, enable collaboration with surrounding communities and help to address climate change in North Baffin.</i></p> <p style="padding-left: 40px;"><i>Stratos summarized the feedback into ten (10) themes, including:</i></p> <ol style="list-style-type: none"> <li>1. Inuit Leadership &amp; Ownership</li> </ol>

IR #	Reviewer's Comment	Baffinland's Response
		<ol style="list-style-type: none"> <li>2. <i>Targets and Timeframes</i></li> <li>3. <i>Transparency</i></li> <li>4. <i>Collaboration</i></li> <li>5. <i>Shipping and Other Transportation</i></li> <li>6. <i>Environmental Policies</i></li> <li>7. <i>Community Resilience and Adaptation</i></li> <li>8. <i>Climate Scenario Analysis</i></li> <li>9. <i>Data, Monitoring and Reporting</i></li> <li>10. <i>Strategy Renewal</i></li> </ol> <p><i>These themes helped Baffinland develop its first Goals and Supporting Objectives of the Climate Change Strategy, which include 1) Improve Energy Efficiency and Forge Path to Decarbonization, and 2) Monitoring Changes in Climate and Associated Risks to Inform Adaptation and Closure Strategies."</i></p>
QIA IR 19	<p>Sustaining Operations Proposal 2, Section 14: Transboundary Effects of the Project</p> <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</p>	<p>For more direct information within the SOP2 FEIS Addendum regarding Baffinland's spill response planning and readiness, the reviewer is directed to review Chapter 15 'Accidents and Malfunctions'. Baffinland has provided specific section references and NIRB Registry Numbers wherever possible to aid reviewers in accessing documentation that the SOP2 FEIS is based or builds on.</p> <p>The FEIS Addendum reflects that Baffinland understands the risk of fuel spills are of concern to Inuit, which has shaped our spill response planning since initial Project planning and assessment. For example, this understanding is reflected at Chapter 10, Section 10.1.9, Page 281:</p> <p><i>"Community members expected that animals would change their behaviour and that marine habitats would be lost because of the Mary River Project (e.g., sea ice would melt more quickly if broken up by ships, contamination of water and animals from dust or fuel spills) (QIA 2021)."</i></p>

IR #	Reviewer's Comment	Baffinland's Response
	<p>mitigation and emergency response measures to reduce the risk of fuel spills.</p> <p>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.</p>	<p>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. The specific feedback raised by Inuit through the various regulatory review processes the Project has undergone has translated into very specific terms and conditions and material spill modelling, risk assessment and response planning materials.</p>
QIA IR 20	<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> <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>The information requested in this comment is addressed very specifically in the Adaptive Management Plan, available on the NIRB Public Registry for SOP2 (NIRB Registry Number 349416) and referenced in multiple locations throughout the SOP2 FEIS Addendum and Chapter 16. Incorporating community feedback and IQ into the Adaptive Management Plan is an important topic to both Baffinland and QIA.</p> <p>The Adaptive Management Plan was developed in collaboration with the QIA and jointly approved in 2020. The AMP clearly outlines how Inuit, community members and the QIA will be involved in adaptive management, including the periodic review and amendment of the Adaptive Management Plan itself. Key sections containing information to aid the reviewer include:</p> <ul style="list-style-type: none"> <li>• Roles and Responsibilities (Section 1.4)</li> <li>• The Role of IQ and Community Involvement in Adaptive Management (Section 1.5)</li> <li>• Adaptive Management Response Framework (Section 2)</li> <li>• Adaptive Management Integration (Section 3)</li> <li>• Reporting (Section 4)</li> </ul> <p>In short, there is a comprehensive feedback system incorporated in the Adaptive Management Plan that has been developed jointly with and approved by QIA.</p>

IR #	Reviewer's Comment	Baffinland's Response
	<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 Qaujimagatuqangit 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> <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</p>	<p>It should also be noted that over and above the feedback mechanisms incorporated in the Adaptive Management Plan itself, the NIRB annual reporting and comment process would also apply, and provides an important opportunity for incorporation of feedback.</p>

IR #	Reviewer's Comment	Baffinland's Response
	<p>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 Qaujimagatuqangit and Inuit perspectives are integrated into the Adaptive Management Plan, and associated monitoring and mitigation measures.</p>	
QIA IR 21	<p>Appendix 1: Community Engagement Records</p> <p>Attachment 1.1, Community Engagement Records does not contain a table of contents and is difficult to navigate.</p> <p>Please provide a table of contents for all Community Engagement Records and organize the material so that it is easy to navigate.</p>	<p>SOP2 FEIS Addendum Attachment 1.1 Community Engagement Records has been split into seven parts due to document size. For ease of reference, the components of each Part are outlined below. Upon review, it was noted that an administrative error occurred and Parts 4 (pages 122-132), Part 5, Part 6 and Part 7 of the Appendix are a duplication of the information found in Parts 1 to 4 <b>(indicated in bold blue font for emphasis)</b>.</p> <p>Attachment 1.1 – Part 1</p> <ul style="list-style-type: none"> <li>• Kinngait Engagement Follow Up Letters, (p. 1-7)</li> <li>• Kinngait Community Engagement summary, January 31, 2024 (p.8-63)</li> <li>• Steensby Component Engagement Report (SCER) (January 2024) (p. 64-75)</li> <li>• SCER Appendix A – Invitation Letters (November 3, 2023) p. 76-85</li> </ul> <p>Attachment 1.1 – Part 2</p> <ul style="list-style-type: none"> <li>• SCER Appendix B - Mary River update Community Presentations Materials – November 2023 (p. 1-77)</li> </ul> <p>Attachment 1.1 – Part 3</p> <ul style="list-style-type: none"> <li>• SCER Appendix C – 3D Models (p. 1-5)</li> <li>• SCER Appendix D – Map Book (p. 6-24)</li> </ul>

IR #	Reviewer's Comment	Baffinland's Response
		<p>Attachment 1.1 – Part 4</p> <ul style="list-style-type: none"> <li>• SCER Appendix E – Meeting Records               <ul style="list-style-type: none"> <li>○ Igloodik Community Engagement Summary, November 27, 2023 (p. 1-12)</li> <li>○ Igloodik Community Workshop, November 28, 2023 (p. 13-32)</li> <li>○ Sanirajak Community Engagement Summary, November 29, 2023 (p. 33-45)</li> <li>○ Sanirajak Community Engagement Summary, November 30, 2023 (p. 46-60)</li> <li>○ Pond Inlet Community Workshop, December 1, 2023 (p. 61-73)</li> <li>○ Sanirajak Community Radio Show, December 4, 2023 (p. 74-75)</li> <li>○ Arctic Bay Community Engagement Summary, December 5, 2023 (p. 76-81)</li> <li>○ Clyde River Community Engagement Summary, December 6, 2023 (p.82-90)</li> </ul> </li> <li>• SCER Appendix F – Follow-up Letters (January 19, 2024; includes responses to concerns heard) p. 91-121</li> <li>• <b>SCER Appendix A – Invitation Letters (November 3, 2023) p.122-132</b></li> </ul> <p>Attachment 1.1 – Part 5</p> <ul style="list-style-type: none"> <li>• <b>SCER Appendix B - Mary River update Community Presentations Materials – November 2023 (p. 1-77)</b></li> </ul> <p>Attachment 1.1 – Part 6</p> <ul style="list-style-type: none"> <li>• <b>SCER Appendix C – 3D Models (p. 1-5)</b></li> <li>• <b>SCER Appendix D – Map Book (p. 6-24)</b></li> </ul> <p>Attachment 1.1 – Part 7</p> <ul style="list-style-type: none"> <li>• <b>SCER Appendix E – Meeting Records</b></li> </ul>
QIA IR 22	Attachment 2.2, Steensby Baseline Studies Summary (2021-2024)	Available reports requested were provided directly to QIA staff via email on August 30, 2024.

IR #	Reviewer's Comment	Baffinland's Response
	<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"> <li>• Ice study</li> <li>• Terrestrial</li> <li>• Archaeology</li> <li>• Marine environment</li> <li>• Freshwater environment</li> <li>• Marine Mammals</li> <li>• Socio-Economic</li> </ul> <p>Please provide all relevant reports that are not already included with the current SOP2 Application, including:</p> <ul style="list-style-type: none"> <li>• Steensby Inlet Iron Ore Shipping Project – Fixed Wing Survey</li> <li>• Steensby Inlet Fast Ice Study</li> <li>• Multibeam Bathymetric Survey in Steensby Inlet – Marine Survey Operations Report</li> <li>• 2021-22 Steensby Physical Oceanography Program</li> <li>• Steensby Port and Railway Freshwater Habitat Surveys: Non-Fish Bearing Sites</li> <li>2021-2023 Potential Offsetting Sites: 2023 Freshwater Habitat Surveys</li> </ul>	<p>These reports will continue to be submitted to the NIRB as they become available and within the context of satisfying specific terms and conditions or contributing to the development of monitoring programs broadly required by the Project Certificate.</p>

IR #	Reviewer's Comment	Baffinland's Response
	<ul style="list-style-type: none"> <li>• Water Withdrawal Notification and Hydrological Assessment – Steensby Component</li> <li>• Steensby Port Arctic Char Otolith Analysis</li> <li>• Fish Passage Assessment – Steensby Component</li> <li>• Construction of the Steensby Inlet Railway Underwater Noise Modelling Report: Freshwater</li> <li>• Terrestrial Environment – 2021 Annual Monitoring Report, which includes satellite-based dust monitoring of the Steensby Port area</li> <li>• 2023 Late-Winter Aerial Caribou Survey Summary Report</li> <li>• Summary of Baffinland's 2023 Data Collection Programs and Planning</li> </ul> <p>QIA also requests that Baffinland provide forthcoming reports to QIA when they are available.</p>	
QIA IR 23	<p>Sustaining Operations Proposal 2, figure 6.2, p. 132            Sustaining Operations Proposal 2, Attachment 3.3            QIA Comments on SOP2 Proposal, p. 182 GN DOE. 2019. "Baffin Island Caribou Management Plan: Working Together to Ensure Baffin Island Caribou Harvest Is Sustainable."  <a href="https://www.nwmb.com/iku/list-all-site-files/nwmbmeetings/regularmeetings/2020-1/rm-001-2020-iquait-march-11-2020/english-10/8002-tab2bgn-mp-baffin-island-caribou-mp-eng/file">https://www.nwmb.com/iku/list-all-site-files/nwmbmeetings/regularmeetings/2020-1/rm-001-2020-iquait-march-11-2020/english-10/8002-tab2bgn-mp-baffin-island-caribou-mp-eng/file</a></p>	<p>Baffinland will provide an updated Figure 6.2 during the technical review period. In the interim and as confirmed by QIA, the modified extent of the North Baffin spatial boundary is described in Section 6.2 of the SOP2 FEIS Addendum. Note that Baffinland has provided a better resolution image of Figure 6.2, which can be found in Attachment 1.1 of this submission.</p>

IR #	Reviewer's Comment	Baffinland's Response
	<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. 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. 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> <p>QIA requests that Baffinland share the revised version of figure 6.2 that they noted in their reply to QIA's comment #3.</p>	
QIA IR 24	<p>Sustaining Operations Proposal 2, Attachment 3.3 QIA Comments on SOP2 Proposal, p. 186 and 187 SOP2, Attachment 5.2 6 Mtpa Isopleth Modelling</p> <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>Isopleth modelling for the Tote Road is available for two substantial segments, the first extending 20km north from the Mine Site and the second extending 30km south from Milne Port. These two areas cover approximately 50% of the entire length of the Tote Road. Modelling for the entire length of the Tote Road is not required for the purpose of assessing the potential effects of dustfall along the Tote Road in the context of a 6Mt operation. The quantity emission sources, terrestrial characterization, meteorological characteristics are all the same in the uncovered segments of the Tote Road as occur in the covered segments of the Tote Road and the extent of dust will generally be the same in both cases. Additional modelling will not yield distinct changes in mitigation measures or monitoring programs.</p> <p>It is also worth noting that the 6Mt isopleth model was developed to satisfy a commitment stemming from the PIP Renewal and was not developed to support the SOP2 Reconsideration. For the current reconsideration process, Baffinland is able to provide actual observations and data from the same 6 Mt operation the</p>

IR #	Reviewer's Comment	Baffinland's Response
	<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. 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> <p>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</p>	<p>SOP2 is proposed to sustain. Predictive modelling is a better tool for greenfield projects where actual monitoring data is not available. This further supports Baffinland's view that additional modelling is not required in relation to the SOP2 reconsideration.</p> <p>Isopleth modelling for the Steensby Port and a portion of the Steensby Railway north of Steensby Port can be found in the FEIS, Volume 5, Appendix 5C-5. As the air quality and dust monitoring programs are extended to approved but not yet built project infrastructure, additional baseline information will be collected and updates, where relevant, to the original predictive models will be considered. Baffinland will work with the QIA and communities collaboratively through this process.</p> <p>In the interim, the QIA is encouraged to review the Air Quality and Noise Abatement Management Plan (NIRB Registry ID 349404) as part of their technical review. The most current version of the plan has been placed on the SOP2 NIRB Public Registry and is available for review in relation to SOP2.</p>

IR #	Reviewer's Comment	Baffinland's Response
QIA IR 25	<p>Document Name: Surface Water and Aquatic Ecosystem Management Plan; NIRB Notice Re Scope and Conformity SOP2; NIRB Concordance Table SOP2 Impact Statement Addendum Section: 9.4.3 Page: 42</p> <p>When discussing the construction of the Steensby Port and Railway in regard to the water quality and quantity monitoring programs the proponent states, "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"</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 "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."</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</p>	<p>As the water quantity and quality monitoring programs are extended to approved Project infrastructure that has not yet been built, additional baseline information will be collected and updates, where relevant, to the original predictive models will be considered. Baffinland will work with the QIA and communities collaboratively through this process.</p> <p>In the interim, the QIA is encouraged to review the Aquatic Effects Monitoring Plan (NIRB Registry ID 349414) and the Surface Water and Aquatic Ecosystem Management Plan (NIRB Registry ID 350946) as part of their technical review. The most current version of each plan has been placed on the SOP2 NIRB Public Registry and is available for review in relation to SOP2.</p>

IR #	Reviewer's Comment	Baffinland's Response
	<p>SOP2. How the proponent proposes to monitor for potential aquatic effects should be included as part of the technical review.</p> <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>	
QIA IR 26	<p>Document Name: Snow Management Plan; NIRB Notice Re Scope and Conformity SOP2; NIRB Concordance Table SOP2 Impact Statement Addendum</p> <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> <p>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).</p>	<p>The QIA is encouraged to review the Snow Management Plan (NIRB Registry ID 349412) as part of their technical review. The most current version of the plan has been placed on the SOP2 NIRB Public Registry and is available for review in relation to SOP2.</p>
QIA IR 27	<p>Document Name: Air Quality &amp; Noise Abatement Management Plan (AQNAMP); NIRB Notice Re Scope</p>	<p>As the air quality and dust monitoring programs are extended to approved but not yet built Project infrastructure, additional baseline information will be collected and updates, where relevant, to the original predictive models will be</p>

IR #	Reviewer's Comment	Baffinland's Response
	<p>and Conformity SOP2; NIRB Concordance Table SOP2 IS Addend Section: 5.4.3 Page: 33</p> <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 "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."</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 &amp; 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 &amp; 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>	<p>considered. Baffinland will work with the QIA and communities collaboratively through this process.</p> <p>In the interim, the QIA is encouraged to review the Air Quality and Noise Abatement Management Plan (NIRB Registry ID 349404) as part of their technical review. The most current version of the plan has been placed on the SOP2 NIRB Public Registry and is available for review in relation to SOP2.</p>

IR #	Reviewer's Comment	Baffinland's Response
	<p>QIA requests the Proponent update the Air Quality &amp; 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.</p>	
QIA IR 28	<p>Document Name: Fresh Water Supply, Sewage and Wastewater Management Plan (FWSSWMP); NIRB Notice Re Scope and Conformity SOP2; Page 19 of 24 NIRB Concordance Table SOP2 IS Addend Section: Table 7 and Section 6.3.4</p> <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 "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."</p> <p>The proponent noted in the FWSSWM Plan that "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."</p>	<p>As the water quantity and quality monitoring programs are extended to approved but not yet built Project infrastructure, additional baseline information will be collected and updates, where relevant, to the original predictive models will be considered. Baffinland will work with the QIA and communities collaboratively through this process.</p> <p>In the interim, the QIA is encouraged to review the Fresh Water Supply, Sewage and Wastewater Management Plan (NIRB Registry ID's 350896, 350897, 350898, 350890) as part of their technical review. The most current version of each plan has been placed on the SOP2 NIRB Public Registry and is available for review in relation to SOP2.</p>

IR #	Reviewer's Comment	Baffinland's Response
	<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> <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>	
QIA IR 29	<p>Document Name: Transitional Operations Proposal; Section: Table 1 Page: 7</p> <p>The Transitional Operations Proposal states that “The SOP FEIS Addendum will include an assessment of the effects of the environment on the Project and include considerations for climate change.”</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</p>	<p>Baffinland can confirm that all approved but not yet built Project infrastructure will be built to satisfy all applicable site-specific environmental authorizations, engineering and construction standards and other requirements of financiers and insurers.</p> <p>The Climate Change Assessment provided as Attachment 5.1 to the SOP2 FEIS Addendum identifies a range of climate change scenarios, including RCP 8.5, and all are discussed in the context of the assessment. Given the nature of the sustained 6 Mtpa production and transportation activities and the absence of new or modified infrastructure proposed to be built under the SOP2, there is no reasonable need to update the Climate Change Assessment for current reconsideration purposes.</p>

IR #	Reviewer's Comment	Baffinland's Response
	<p>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 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> <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>	
QIA IR 30	<p>Document Name: Steensby Baseline Studies Summary Section: Table 2 Page: 3</p> <p>Proponent noted that in 2024 field studies were planned for “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”.</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</p>	<p>2024 field programs are just concluding and the data must be analyzed and reviewed before it can be reported. All available updated baseline reports have been provided to the NIRB and QIA.</p> <p>As the freshwater biota monitoring programs are extended to approved but not yet built infrastructure, additional baseline and updates to the original predictive models, where relevant, will be considered. Baffinland will work with the QIA and communities collaboratively through this process.</p>

IR #	Reviewer's Comment	Baffinland's Response
	<p>construction and operation of the Steensby Rail and Port.</p> <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>	
QIA IR 31	<p>Document Name: Baffinland NIRB Annual Report, Snow Management Plan Section: Figures 1-11 Page: 23, 24, 27, 28, 33-38, 43</p> <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> <p>QIA requests that the figures provided in the Snow Management Plan be replaced with higher-resolution figures.</p>	<p>See Baffinland's response to QIA IR 26. The Snow Management Plan pdf document has been compressed to meet size requirements, which has, in some instances, reduced the quality of certain figures. Standalone maps with enhanced resolution are provided as Attachment 2 of this submission.</p>
QIA IR 32	<p>Document Name: Snow Management Plan Section: Table 5 Page: 13</p> <p>Table 5 of the Snow Management Plan provides information on snow clearing along the Tote Road, and states that snow clearing will "avoid or minimize barrier effects on wildlife movement" (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</p>	<p>See Baffinland's response to QIA IR 26. The Snow Management Plan is available on the NIRB Registry, ID 349412.</p>

IR #	Reviewer's Comment	Baffinland's Response
	<p>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.</p> <p>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.</p>	
QIA IR 33	<p>Adaptive Management Plan – NIRB File No 349416</p> <p>The Adaptive Management Plan does not seem to have been updated for the Steensby Rail and Port, which are critical milestones within SOP2. Some nonexhaustive examples are below.</p> <p>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</p>	<p>The Adaptive Management Plan provides general guidance for the integration of adaptive management across Baffinland's Environmental Management System, regardless of the location of activities. That being said, as individual management plans are updated from time to time, some updates may be required to their descriptions in Section 3 'Adaptive Management Integration'. Similarly, as the 'objectives, indicators, thresholds and response' (called trigger, action and response plans or TARP's in Baffinland management plans) evolve, they will be updated in Appendix C.</p> <p>Baffinland will work with the QIA and communities collaboratively through the plan update process described in the Adaptive Management Plan.</p> <p>In the interim, the QIA technical reviewer is encouraged to review the Adaptive Management Plan (NIRB Registry ID 349416) as part of their technical review.</p>

IR #	Reviewer's Comment	Baffinland's Response
	<p>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.</p> <p>Section 3.4.4: There seems to only be a specific Oil Pollution Emergency Plan for Milne Inlet.</p> <p>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</p>	<p>The most current version of each plan has been placed on the SOP2 NIRB Public Registry and is available for review in relation to SOP2.</p>
QIA IR 34	<p>Aquatic Effects Monitoring Plan, NIRB File No 349414, Sections 2.3.6.3 and 3.1.3.8</p> <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>	<p>This suggestion will be taken into consideration in relation to future plan updates. As a matter of version control, Baffinland will hold additional edits to the Aquatic Effects Monitoring Plan and the Surface Water and Aquatic Ecosystem Management Plan until the SOP2 reconsideration process is complete.</p> <p>In the interim, the QIA is encouraged to review the Aquatic Effects Monitoring Plan (NIRB Registry ID 349414) as part of their technical review. The most current version of the plan has been placed on the SOP2 NIRB Public Registry and is available for review in relation to SOP2.</p>

IR #	Reviewer's Comment	Baffinland's Response
	<p>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)</p>	
QIA IR 35	<p>Aquatic Effects Monitoring Plan, NIRB File No 349414</p> <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> <p>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.</p>	<p>For clarity the Aquatic Effects Monitoring Plan applies to the Mine Site only, not to supporting infrastructure outside that immediate area. The construction and operation of all approved but not yet built Project infrastructure was considered through previous environmental assessment and water licencing processes.</p>
QIA IR 36	<p>Climate Change Strategy, NIRB File No 349415</p> <p>This document predicts climate change effects to only 2028, which is four years prior to the potential end date of SOP2.</p> <p>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).</p>	<p>The Climate Change Strategy proposes to cover the five year period occurring between 2023 and 2028, and was developed while the Project was permitted and operating at a 6 Mt production and transportation rate. Prior to the end of the current term, Baffinland will reengage organizations in a process similar to that carried out in support of the existing Strategy and as described in the Strategy itself under the header 'Strategy Development Process'.</p> <p>In their correspondence of September 26, 2024, NIRB requested that Baffinland provides a summary regarding validation of use of previous climate change data that was used for the FEIS Addendum, see response to QIA IR 29 for additional information.</p>

IR #	Reviewer's Comment	Baffinland's Response
	Update any analysis in the Impact Statement which depend on these models accordingly.	
QIA IR 37	<p>Marine Monitoring Plan, NIRB File No 349409</p> <p>Reports do not adequately reference the permit they are about.</p> <p>Please update this document to include permit identification numbers in brackets next to each mention of applicable permits.</p>	<p>This suggestion will be taken into consideration in relation to future plan updates. As a matter of version control, Baffinland will hold additional edits to the Marine Monitoring Plan until the SOP2 reconsideration process is complete.</p>
QIA IR 38	<p>Marine Monitoring Plan, NIRB File No 349409, Table 2-2</p> <p>It is unclear whether the adaptive management checklist takes into consideration the current status of the Project.</p> <p>Please confirm if Table 2-2 is updated to reflect the current status.</p>	<p>Confirmed. The MMP reflects the current status of the Project. Table 2-2 was developed while Baffinland was permitted and operating at a 6 Mt production and transportation rate.</p>
QIA IR 39	<p>Shipping and Marine Wildlife Management Plan, NIRB File No 349405</p> <p>IS Addend Att 6.5, Underwater Acoustic, NIRB File No 350995</p> <p>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</p>	<p>Shipping operations along the Northern Shipping Route and Southern Shipping Route occur in geographically distinct and non-overlapping areas, eliminating the potential for any combined effects on Marine Environment VCs. During the period when Baffinland shipping operations will take place simultaneously along the Northern and Southern shipping routes, shipping-related impacts in each respective area would be impacting different populations of marine receptors.</p> <p>The above consideration is included in the SOP2 FEIS Addendum, Chapter 10, Section 10.6 'Residual Effects of SOP2 and Approved Project'. Shipping along the Southern Shipping Route is not discussed throughout Chapter 10 or other SOP2 FEIS Addendum Chapters because it is outside the scope of the proposed SOP2</p>

IR #	Reviewer's Comment	Baffinland's Response
	<p>addendum do not address shipping along the southern shipping route.</p> <p>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.</p>	<p>activities and spatial boundaries, and only relevant in the context of combined or cumulative residual effects, where it has been captured.</p>
GOC IR 01	<p>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 Cumulative Effects Assessment Framework Workshop.</p>	<p>This information is provided in the FEIS Addendum in Chapter 6, Section 6.11.1.2 'Cumulative Effects Assessment Framework Workshop'. Within that Section, Table 6.6 is included, which provides a concordance between the topics and commitments Baffinland presented at the CEA Framework Workshop and the SOP2 FEIS Addendum.</p>
CIRNAC IR 01	<p>CIRNAC requests the following details to be shared, to support the technical review for SOP2:</p> <p>1. Clarification of new mitigation commitments related to predicted SOP2 project effects. It is preferred that these are presented within draft management plan updates.</p> <p>2. Additional information to understand the predicted SOP2 project effects related to the following technical data, information and/or modelling:</p> <p>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.</p>	<p>1. Baffinland has not presented any new or additional mitigation measures in the SOP2 FEIS Addendum. Baffinland has operated at a 6 mtpa production and transportation level since 2018 and the management plans placed on the SOP2 record for reference reflect the various commitments related to environmental mitigation and monitoring that have been extended or agreed to through previous regulatory processes. No revised mitigation plans are required at this time.</p> <p>2. The information and updates requested in relation to the Interim Closure and Reclamation Plan, the Life of Mine Waste Rock Management Plan, the Phase 1 Waste Rock Management Plan and the Surface Water and Aquatic Ecosystem Management Plan are not required or relevant to the sustained 6 mtpa production and transportation rates requested under SOP2 and under consideration by NIRB.</p> <p>It is important to clarify that SOP2 does not change the overall volumes or proportions of PAG versus NAG waste rock to be produced and managed over the life of the Project. The system developed and</p>

IR #	Reviewer's Comment	Baffinland's Response
	<ul style="list-style-type: none"> <li>- Current aerial photos</li> <li>- Contact Water Quality predictions using current mine monitoring data (rather than only modeled data)</li> <li>- 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</li> <li>- 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).</li> <li>- An update for waste rock placement strategy to correspond to strategy presented in the ICRP and Phase 1 WRMP Phase 1: Waste Rock Management Plan</li> <li>- Explain how the Waste Rock Facility component pathways of potential effect were analyzed (e.g., model evaluation) relative to the SOP2 rate of production, and how this analysis led to the waste rock facility exclusion in Table 6.2 Scoping of Potential Interaction and Effects of SOP2.</li> <li>- Provide 2023/2024 thermal evaluation and monitoring annual datasets for the WRF and include the associated climate change model (data, assumptions). Surface Water and Aquatic Ecosystem Management Plan</li> <li>- Provide a current / updated version to clarify monitoring station locations.</li> </ul>	<p>implemented in relation to waste rock management is intended to capture variations in short term management as detailed information becomes available through the progressive development of Deposit No. 1. This planning occurs in 2-3 year intervals and is integrated into updates to the phased waste rock management plans. Waste rock is currently managed under the Phase 1 Waste Rock Management Plan, which has been revised and approved under the Nunavut Water Board process several times. The information requested by CIRNAC is considered within the outlined management plans, which CIRNAC has available to them.</p> <p>These management plans will be considered in due course through the annual reporting process related to the Commercial Lease and Type A Water License. For instance, on September 16, 2024, Baffinland provided an updated draft of the ICRP to CIRNAC for review. This ICRP will be submitted officially to the QIA and NWB, under the Commercial Lease and Type A Water Licence Annual Security Review (ASR) process, at which time it will be further reviewed. Similarly, the thermal evaluation of the WRF, including associated climate change models, will be submitted as part of the ASR process. However, this information is not uniquely relevant to the SOP2 reconsideration and is more appropriately considered through the Type A Water Licence processes already underway.</p>
CIRNAC IR 02	CIRNAC requests that the Proponent:	1) The date of closure provided in regulatory applications and management plans to date has been based on assumptions related to

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	<p>1. Confirm the intended date of closure for the Mary River Project, and under what review process the date of closure was approved.</p> <p>2. Confirm if the intended date of closure represents a temporal difference relative to the existing approved scope of operations for the Mary River Project.</p> <p>3. If the intended date of closure is 2051, please confirm that the effects assessment (including models that may be used for predictions) encompasses 2051 for the time horizon assumptions.</p>	<p>the commencement of construction of the Steensby Components of the Project. The anticipated life of mine is more relevant to planning, environmental management and closure.</p> <p>The 2039 date referenced by CIRNAC is a product of anticipating the operation of the Steensby Components to commence in 2018 (which would have followed a 4-year construction phase commencing in 2014). The 2051 date presented in the SOP2 FEIS Addendum is the product of anticipating the operation of the Steensby Components to commence in 2030, which is a conservative assumption based on current proximity to receiving final activity specific authorizations, financing and a final construction decision by the Company, none of which is final at this time.</p> <p>The Interim Closure and Reclamation Plan available on the SOP2 public registry is the conditionally approved Rev 5. Baffinland has developed a draft Rev 6 for submission with Baffinland's 2025 Work Plan, which will commence the 2025 Annual Security Review on November 1, 2024. On September 16, 2024, Baffinland has provided the draft ICRP Rev 6 to CIRNAC for preliminary review. The draft ISCRP Rev 6 contains closure dates consistent with the SOP2 FEIS Addendum and will be reviewed accordingly under a parallel public process appropriately administered under the Type A Water Licence by the Nunavut Water Board.</p> <p>2) The intent to expand reserves at Deposit No 1 through ongoing exploration is clearly identified in the original project description in the FEIS, Volume 3, Section 1.4 'Potential for Future Development'. The potential to expand the reserves and the activities required to do so are then described as relevant through the remainder of Volume 3 and were ultimately approved as part of the positive NIRB Recommendation Report and subsequent Ministerial approval. Whether the expanded reserves translate into an extended mine life is dependent on multiple</p>

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		<p>factors, including but not limited to the average rate of production and transportation, the long term price of iron ore, and other market factors. Baffinland believes the revised closure dates do not represent a significant difference relative to existing approvals and that there are mechanisms under both the Project Certificate and the Water License to ensure the ongoing operation of the Project adheres to the predictions contained within the original assessments and as revised from time to time through annual monitoring and reporting.</p> <p>3) See response to CIRNAC IR 02 sub-request (2).</p>
CIRNAC IR 03	CIRNAC requests that the Proponent review the documents identified in the reference above and provide a replacement for any low-resolution figures. It is requested that resolution quality allow for label and data legibility.	<p>As a matter of version control Baffinland will replace the referenced figures in the Phase 1 Waste Rock Management Plan and the Interim Closure and Reclamation Plan prior to submitting updated versions to the Nunavut Water Board. The Phase 1 Waste Rock Management Plan was submitted to the NWB as part of the 2023 Annual Report on Operations for public review. Before the Plan is approved by the NWB, Baffinland must consider any relevant comments received and submit a revised copy, if necessary. Similarly, Baffinland intends to submit a revised ICRP to NWB as part of the 2025 Annual Security Review. Baffinland will ensure that copy includes the requested revised figures.</p> <p>As this is being addressed in the parallel ongoing NWB Type A Water Licence annual reporting process, it would be duplicative to also require it to proceed with the SOP2 reconsideration process.</p>
ECCC IR 01	ECCC requests that the Proponent provide an assessment of air quality impacts for the Milne Port area to be expected during concurrent activities of ore shipments up to 6.9 MTPA and construction supply shipments associated with the development of the approved Steensby Port and Southern Railway. Include in the analysis the air quality	The SOP2 FEIS Addendum assessment of effects on air quality contained in Chapter 7 considers: 1) monitoring results current to 2023, the first year Capesize vessels called on Milne Port; and 2) the potential effects of anticipated shipping activities, not ore volumes (i.e. a maximum of 84 ore carriers, which may carry up to 6.9 Mt).

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	<p>impacts associated with the use of larger Capesize ore carriers for outbound shipments</p>	<p>To point 1), in 2023 Baffinland satisfied two commitments stemming from the SOP reconsideration process and reflected in Appendix B of Amendment No 005 to Project Certificate 005, specifically this included:</p> <ul style="list-style-type: none"> <li>• Baffinland will confirm for ECCC in November 2023 the actual dates the Capesize vessels were in the Milne Port vicinity (at berth and at anchor) in 2023; and</li> <li>• Baffinland will conduct an internal review of the continuous air quality monitoring data from July 1 to October 31 to identify potential hourly and daily concentrations greater than the 2025 Canadian Ambient Air Quality Standards and Nunavut Ambient Air Quality Standards. Concentrations greater than the threshold will be investigated to determine potential cause. Baffinland will provide results of the review of the continuous air quality monitoring data to ECCC by December 15th, 2023. All data for the season will continue to be reported on the standard annual report timeline.</li> </ul> <p>Baffinland satisfied the above commitments by providing ECCC a memo on December 18, titled 'Ambient Air Quality Monitoring – July to October, 2023'. The memo is available in Attachment 3 of this submission. Most notably, this report confirmed the data do not show any observable trends of air quality impacts associated with the times that Capesize vessels were in the Milne Port area.</p> <p>To point 2), both the SOP and SOP2 FEIS Addendums indicate any stranded ore to be shipped in a season, up to 0.9 Mt (6.9 Mt total) would have to be shipped on no more than the assessed 84 ore carriers. The Air Quality modelling provided in Attachment 5.2 of the SOP2 FEIS Addendum assumed a conservative number of Capesize vessels in the vessel mix, much more than has been seen to date at the Project (3 of 75 trips in 2024) or is possible in the future given the limited availability of Capesize ore carriers capable of operating in the Canadian Arctic during the short northern shipping season. For more details related to air</p>

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		<p>quality modelling assumptions related to the marine area see Attachment 5.2, Appendix A, Section A.2 (marine activities are described at A.2.3.10 and A.2.3.11).</p> <p>Considering the response to points 1) and 2) detailed above, the current air quality assessment in Chapter 7 of the SOP2 FEIS Addendum contains the requested information and no further information is required at this time.</p>
ECCC IR 02	<p>ECCC requests that the Proponent provide an assessment of shipping emissions (black carbon, PM, NOx, SOx, and GHGs) along the whole shipping route (in both Canadian and Greenland waters) for the ore carriers and include:</p> <ul style="list-style-type: none"> <li>• Consideration for fuel types that will be used to comply with regulations coming into force (i.e., HFO ban and Arctic ECA);</li> <li>• Consideration of ore carrier size, i.e. Panamax, and Capesize, which will affect emission rates;</li> <li>• Comparison with national totals or inventories of emissions for each country; and</li> <li>• Ship track information (i.e., latitude/longitude) preferably at one-hour intervals for all outgoing and incoming ore carrier trips from Milne Port to longitude 43 degrees west (southern tip of Greenland; on the way to European ports) and back for the 2023 shipping season in an Excel or comma-separated values (CSV) format</li> </ul>	<p>Air emissions modelling for activities occurring outside of the Nunavut Settlement Area (NSA) and the marine Regional Study Area (RSA) are outside the scope of the Mary River Guidelines for the Development of an FEIS and the NIRB reconsideration of the SOP2 FEIS Addendum. While the Proponent is advised to duly consider the transboundary implications of impacts to identified VECs/VSECs as results of marine shipping for the Project, for the purpose of the Guidelines, transboundary effects are those linked directly to the activities of the Project <b>inside the NSA</b>, which occur across provincial, territorial, international boundaries or may occur outside of the NSA. Activities outside of the NSA are thus not transboundary and there is no requirement under the Guidelines to assess those activities as requested by ECCC.</p> <p>Furthermore, Baffinland is deferring specific responses to information requests relating to Greenland/Espoo Convention until after it is able to have further discussions about the application of Espoo Convention to SOP2 with the Government of Canada.</p>
DFO IR 01	DFO requests:	<ol style="list-style-type: none"> <li>1. The record of Baffinland's responses to technical comments under the PIP (NIRB registry No. 319335), PIPE (NIRB Registry No. 335787), PIPR</li> </ol>

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	<ol style="list-style-type: none"> <li>1. The Proponent 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.</li> <li>2. The Proponent to describe how monitoring results have informed the proposed project; Specifically include issues with non-indigenous species identification, narwhal monitoring and improvement to monitoring plans, and adaptive management as raised in comments to annual reports.</li> <li>3. The Proponent 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.</li> </ol>	<p>(NIRB Registry No. 341454) and SOP (NIRB Registry No. 346005) are readily available on the respective NIRB public registries for each of those files and presumably in DFO's own internal records. The manner in which they were addressed is identified as part of the proponent's response and culminated in approval by the NIRB and responsible Minister. Further information will be provided in the NIRBs recommendation report and subsequent commitments or Terms and Conditions applied to the Project as result of approval. If this information is of interest to the DFO reviewer, Baffinland encourages the reviewer to access those items directly.</p> <ol style="list-style-type: none"> <li>2. The SOP2 FEIS Addendum does not propose any additional activities, infrastructure or environmental management mechanisms that have not been previously proposed, approved and implemented. This information request is overly broad and not specific to SOP2. Baffinland regularly engages Interveners, including DFO, through the annual monitoring process, including the key sequences of planning, implementing, reporting and adjusting. The development and modification of monitoring programs are also presented and discussed as part of the Marine Environment Working Group, which DFO is member to. The Project described in the SOP2 FEIS Addendum is the same Project currently being carried out, inclusive of the 6 Mtpa production and transportation rates. Baffinland has appropriately provided a summary of its marine monitoring programs and mitigation measures in multiple locations within the SOP2 FEIS Addendum, including Sections 5.2 (Table 5.1) and 10.3. Providing a systemic inventory of the process to develop and modify each monitoring program and mitigation measure over the years is unreasonable and outside the scope of what is required to support the technical review of the SOP2.</li> </ol>

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		<p>3. See response for DFO IR 01, Request #2 above for the general component of this request. To address the specific request related to the summary of action items received through the MEWG, and a description of how they are addressed, please see Attachment 4 of this submission.</p>
DFO IR 02	<p>DFO requests responses to the following questions:</p> <ul style="list-style-type: none"> <li>• When will all ships chartered by the Proponent be equipped with chlorine treatment systems for ballast water?</li> <li>• Will all ships entering Milne Port be equipped with a D-2 standard compliant ballast water treatment system for the 2025 shipping season?</li> </ul>	<ul style="list-style-type: none"> <li>• Baffinland is and will remain compliant with the international Ballast Water Convention and Canada's Ballast Water Regulations, including the mandatory implementation of the D-2 ballast water treatment standard for all international vessels as of September 8, 2024.</li> <li>• It is not clear why this request is relevant to the technical review of the SOP2, given Baffinland's legal requirement and commitment to following the regulations listed above, in addition to Term and Condition 89 of the Project Certificate No. 005.</li> </ul>
DFO IR 03	<p>DFO requests:</p> <ul style="list-style-type: none"> <li>• The Proponent 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.</li> <li>• The Proponent provide risk assessments for potential transboundary impacts from activities within and outside the Regional Study Area. This should include, where available, population estimates for fish and marine mammal populations for which habitat extends to transboundary waters, as well as details on potential impacts of extended shipping and cumulative effects over a longer time than initially assessed.</li> </ul>	<p>The assessment of potential transboundary effects occurring from activities specific to SOP2 occurring within the Nunavut Settlement Area and the marine Regional Study Area are provided in Chapter 14 of the SOP2 FEIS Addendum.</p> <p>Activities occurring outside of the Nunavut Settlement Area and the marine Regional Study Area related to SOP2 are not transboundary in nature as they are not occurring within the jurisdiction of NIRB and Canada.</p> <p>For additional information please see response to ECCC IR 02.</p> <p>Furthermore, Baffinland is deferring specific responses to information requests relating to Greenland/Espoo Convention until after it is able to have further discussions about the application of Espoo Convention to SOP2 with the Government of Canada.</p>

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DFO IR 04	<p>DFO requests the Proponent provide details on their three-year cycle monitoring plan:</p> <ul style="list-style-type: none"> <li>• What contingencies will be undertaken if the aerial surveys are not completed or do not occur when Narwhal are in the Sound;</li> <li>• How the plan will be modified if local Narwhal populations decline;</li> <li>• How the plan will incorporate cumulative effects; and</li> <li>• 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?</li> </ul>	<ul style="list-style-type: none"> <li>• Baffinland does not understand the nature of the first question, in years when aerial surveys are not conducted, narwhal presence in the marine RSA can be confirmed by other Baffinland led marine monitoring programs, chartered vessel participation in the Marine Mammal Observation Network (MMON), third party marine monitoring programs (government, non-governmental organizations, community-based, etc.) and community observations. Given the broad membership in the Marine Environment Working Group (MEWG), Baffinland should be able to rely on its members to provide any relevant regional information available to them.</li> <li>• Baffinland will consider variations to the marine program frequency presented in Table 10.1 of the SOP2 FEIS Addendum based on new information as it is received. Evidence of a significant decline in narwhal population may lead to follow up studies and or investigations. This approach does not require any change in the Marine Monitoring Plan as it is already accounted for in the existing adaptive management provisions.</li> <li>• Cumulative effects are generally considered in the development of monitoring programs and their analysis to help identify the various factors that may be influencing given indicators. Baffinland has adjusted its monitoring programs over time to be able to identify other influencing factors in the marine environment as they have been identified, including other shipping activities, small craft harbour construction, harvesting, climate change, etc. The Marine Monitoring Program is a living document and intended to be revised over time based on the most current guidance and information. It is also noted that DFO has a responsibility towards the monitoring and management of cumulative effects in the same region Baffinland operates to fulfill its own unique mandate. Cumulative effects monitoring is best served</li> </ul>

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		<p>through coordination between proponent and government led programs and better access to available data. Baffinland remains open to entering a collaborative research and data sharing agreement with DFO for multiple reasons, including improvements in cumulative effects monitoring.</p> <ul style="list-style-type: none"> <li>• Baffinland's proposed frequency for aerial surveys (3 years) continues to be greater than DFO's own aerial survey frequency to date (7-10 years). The intent of Baffinland's aerial surveys is to confirm predictions mostly related to disturbance, whereas the intent of DFO surveys is to inform harvest quotas and direct narwhal mortality, a 3 year monitoring frequency for Baffinland's aerial survey program is considered reasonable. Should new information become available that would suggest additional surveys are warranted, Baffinland would consider this through its adaptive management plans and of course, DFO may elect to hold more frequent surveys should they feel it necessary.</li> </ul>
HC IR 01	<p>HC requests the following from the Proponent:</p> <ul style="list-style-type: none"> <li>• Air dispersion modeling for NO<sub>2</sub> and SO<sub>2</sub> specific to SOP2 (i.e., ongoing shipping as well as incremental construction emissions from Steensby Construction activities);</li> <li>• Isopleth mapping for 1-hour, 24-hour, and annual averaging times for NO<sub>2</sub> and SO<sub>2</sub>, including contour lines for health based and other standards/guidelines used;</li> <li>• Updated 24-hour and annual isopleth maps for PM<sub>2.5</sub> to include a contour line for appropriate health-based and other standards/guidelines.</li> </ul>	<p>Air dispersion modelling for dust associated with a 6 Mtpa operation was completed as part of the Sustaining Operations Proposal (SOP) process in 2023 (and included as Attachment 5.2 of the SOP2 FEIS Addendum) and was completed as a commitment to the QIA made during the review of the Production Increase Proposal Renewal in 2022. Modelling of combustion gases was not undertaken as particulate matter was the issue of concern raised during the review process and previous air quality assessments undertaken for the Mary River Project (e.g., RWDI 2012, BIM 2014) already included predictive modelling for combustion gases (including NO<sub>2</sub> and SO<sub>2</sub>). In particular, assessments for the FEIS and ERP FEIS Addendum presented model predictions for combustion gases, for Steensby Port construction and operation.</p> <p>The Project has been operating at a 6 Mtpa level since 2018, and Baffinland's ambient air quality monitoring program includes continuous monitoring of NO<sub>2</sub> and SO<sub>2</sub> at the Mine Site and Milne Port. Updated predictive modelling for</p>

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	<ul style="list-style-type: none"> <li>• 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 multipathway Human Health Risk Assessment;</li> </ul>	<p>combustion gases is therefore not necessary. Measured ambient air quality monitoring results are compared against management thresholds in the Air Quality Noise and Abatement Management Plan (AQNAMP) and a trigger action response plan that includes three management levels: low risk, moderate risk and high risk. The most recent complete year of monitoring, described in the 2023 NIRB Annual Report showed that the measured SO<sub>2</sub> and NO<sub>2</sub> concentrations did not exceed the low risk management level. The monitored NO<sub>2</sub> concentrations at the Mine Site Complex and Milne Port Complex for the period 2020-2023 have been consistently lower than the predicted concentrations at these locations in the FEIS and the ERP. The monitored SO<sub>2</sub> concentrations at the Mine Site Complex and Milne Port Complex for the period 2020-2023 are in the same order of magnitude as the predicted concentrations at these locations in the FEIS and the ERP.</p>
HC IR 02	<p>HC requests the following from the Proponent:          Update the HHRA to include:</p> <ul style="list-style-type: none"> <li>• All relevant exposure pathways (e.g., inhalation, ingestion) and environmental media (e.g., air, drinking water, soil, dust, country foods), or provide a robust rationale for their exclusion;</li> <li>• Characterization of pre-project (i.e., prior to Mary River project development) and pre-production increase (i.e., Early Revenue Phase – 4.2 Mtpa) baseline conditions for relevant environmental media (e.g., soil, dust, water quality);</li> <li>• Assessment of potential health risks from pre-project and pre-production increase scenarios and comparison to the current SOP and predicted SOP2</li> </ul>	<p>The purpose of the 2024 SOP 2 Country Foods Human Health Risk Assessment (2024 CF HHRA) was to determine whether continued dust deposition associated with mine, port and transportation activities related to the SOP and SOP2 have the potential to harm human health through the consumption of country foods harvested in the areas surrounding the Mine, Milne Port and Tote Road. The 2024 CF HHRA followed the same approach that was used in 2018 for the Phase 2 Proposal, in response to Technical Information Request HC-03 (Attachment 5 of this submission).</p> <p>As described in Section 2.2 of the 2024 CF HHRA, while the focus of the assessment was on country food consumption, other exposure pathways also were included for completeness. These pathways included incidental soil ingestion, drinking water and dust inhalation. As such, all relevant exposure pathways were included in the 2024 CF HHRA. The risks related to inhalation of the criteria air contaminants (NO<sub>2</sub>, PM<sub>2.5</sub> and SO<sub>2</sub>) were described previously in Baffinland's response to Phase 2, Information Request HC-04 (Attachment 5 of this submission). The operable exposure pathways for the baseline/current</p>

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	<p>hazard quotients presented in Table 13, Section 5.2 of the CF-HHRA.</p>	<p>conditions scenario and project incremental scenario (SOP2) were further described in Section 2.6 of the 2024 CF HHRA.</p> <p>The pre-development conditions (“pre-project”) were assessed in the original May River Project application (Intrinsic 2010. FEIS Appendix 6G. Evaluation of Exposure Potential from Ore Dusting Events in Selected VECs: Caribou and Blueberry. NIRB Registry No. 285915), wherein the pre-development conditions (using 2010 environmental data) were compared to predicted environmental concentrations for the proposed project. The “pre-production increase” baseline conditions (4.2 Mtpa) are represented by the environmental data collected in 2022. That 2022 data was used to characterize the baseline conditions in the 2024 CF HHRA.</p> <p>The 2024 CF HHRA considered both baseline (i.e., “pre-production increase”) conditions and the project scenario (SOP2). The risk estimates, presented as risk quotients, were summed for these two scenarios to examine the potential cumulative health risks associated with SOP2. The risk quotients presented in Table 13 of the 2024 CF HHRA included a “Baseline + Project” scenario, which represents the potential cumulative health risks for the current conditions plus the SOP2. As the 2024 CF HHRA characterizes the health risks under a cumulative scenario, Baffinland is of the view that the presented information is sufficient to allow for a determination to be made of the potential health risks associated with SOP2.</p>
HC IR 03	<p>HC requests the following from the Proponent:</p> <ul style="list-style-type: none"> <li>• An updated Risk Communication Strategy (provided updates have been made since the 2023 version to incorporate previous feedback).</li> <li>• A comprehensive multi-pathway HHRA and an updated FEIS with stand-alone conclusions to allow</li> </ul>	<p>The Risk Communication Program Proposal presented in the SOP FEIS Addendum (Appendix 11), which outlines Baffinland’s approach to develop the Risk Communication Strategy, has not changed materially since its submission. Baffinland continues to plan to move this initiative forward when communities are ready and available to be meaningfully engaged in the process, given the programs reliance on community involvement and leadership. Baffinland looks forward to moving this initiative forward with the communities and expects further discussions on this through the annual monitoring and reporting cycle.</p>

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	for greater review and engagement by Stakeholders. This could include an update to the IS Addendum's executive and plain language summaries.	See Baffinland's response to HC-02 regarding the request to update the HHRA. Baffinland does not plan on providing an updated SOP2 FEIS Addendum as part of the current NIRB reconsideration. Additional information, technical responses and commitments developed through the NIRB reconsideration will be included in future community engagement materials and environmental management plans as relevant.
PC IR 01	<p>PC requests the following information from the Proponent:</p> <p>- What are the anticipated numbers of voyages to/from Milne Port for each category of project-related vessels (ore carriers, fuel tankers, resupply cargo vessel, icebreakers, tugs) and what is the total number of voyage to/from Milne Port of all project-related vessel combined for each SOP2 year (2025 to 2032).</p>	Baffinland directs Parks Canada to Section 2.3 and Table 2.2 of the SOP2 FEIS Addendum for this information.
GN IR 01	<p>The GN requests/recommends the following:</p> <p>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);</p> <p>(a) the area of direct habitat loss associated with each project/activity listed in Table 8.6, and</p> <p>(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.</p>	<p>Baffinlands cumulative effects assessment related to caribou in the SOP2 FEIS Addendum was based on the quantitative cumulative effects assessment created during Phase 2 based on the input of both the GN and QIA. Baffinland has included the Cumulative Effects Assessment Addendum from the Phase 2 reconsideration as Attachment 6 of this submission. Please refer to Section 3.3 of Attachment 6 for a description of the quantitative methods used for the cumulative effects assessment, including direct habitat loss (1a), details of the zone of influence (1b) and the requested tables.</p> <p>It is important to emphasize that the SOP2 itself proposes no changes to Project footprint and so is not resulting in any additional indirect or direct loss of caribou habitat to what has been previously assessed and approved by the Project Certificate.</p>

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	<p>2) The Proponent should provide details of the quantitative results for the CEA of caribou habitat loss (direct and indirect) that was conducted for the IS Addendum, including tables summarizing absolute and proportionate direct and indirect losses of habitat.</p> <p>3) The Proponent should provide additional context as to how, or if, the CEA for caribou in this IS Addendum was informed by the quantitative CEA for caribou created during the Phase 2 Proposal. Pursuant to this, the Proponent should explain how, or if, peer reviewed studies, published since 2018, were incorporated into CEA analyses for the IS Addendum</p>	
GN IR 02	<p>The GN requests/recommends the following:</p> <p>1) The Proponent should provide a review of data on North Baffin caribou, collected since the 2013 ERP FEIS Addendum, and discuss how/if these data were used in the IS Addendum to update the effects assessment for caribou.</p> <p>2) The Proponent should provide a review of literature, published since 2013, on the effects of roads and mines on caribou. As part of this review, the Proponent should indicate:</p> <p>(a) how/if findings from these studies informed estimates for ZOI and disturbance coefficients used</p>	<p>1) Baffinland has considered all data collected by Baffinland or made available to it collected since the 2013 ERP FEIS Addendum in the assessment of caribou provided in the SOP 2 FEIS Addendum. The reviewer is directed toward the review of information and sources found within Chapter 8.</p> <p>2) See Attachment 6 of this submission in response to GN IR 01. The attachment considers all relevant data and literature current to 2019. The SOP2 FEIS Addendum Chapter 8 furthers this information and includes a summary of monitoring and other existing conditions information current to 2023. The referenced information was used to inform the findings of the FEIS addendum.</p> <p>3) Based on the above clarification the combined and cumulative residual effects assessment of the terrestrial environment do not require reconsideration.</p>

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	<p>to calculate indirect habitat losses in the IS Addendum;</p> <p>(b) how/if findings from these studies regarding the effect of traffic rates on the movements of caribou (in terms of probability of road crossing or avoidance) were used to inform the IS Addendum.</p> <p>3) The Proponent should place the findings of recommendation #2 (as stated above) in the context of currently observed traffic rates on the project's Tote Road and those predicted to occur during the SOP2. This may help assess the degree to which the Tote Road and Steensby Railway (when under construction) will present a barrier to caribou movement.</p>	
GN IR 03	<p>The GN requests/recommends the following: 1) The Proponent should upload a copy of the 2023 Late-Winter Aerial Caribou Survey Summary Report to the NIRB Registry</p>	<p>The 2023 aerial caribou survey is described in Chapter 8, Section 8.1.6 of the SOP2 FEIS Addendum. The survey is also discussed within the 2023 Terrestrial Environmental Annual Monitoring Report, which is included as Appendix G.5.1 to the 2023 Annual Report to the NIRB. Attachment 3.5 of the SOP2 FEIS Addendum provides a reference index for all 2023 Annual Report to NIRB files and their associated registry numbers to facilitate access for reviewers. The 2023 TEAMR can be found by searching for NIRB registry numbers 349734; 349735; 349736 and 349737.</p>
GN IR 04	<p>The GN requests/recommends the following:</p> <p>1) The Proponent should provide additional context (i.e., factors, assumptions and considerations considered) used in determining the threshold of an average of 36,000 tonnes/day for 30 consecutive days.</p>	<p>1) The commercial transportation rate is based on approximate value of 36,000 tonnes/day based on operational confidence that the Steensby Railway is operating as planned and it can commence with the discontinuation of ore transportation through the Northern Transportation Corridor.</p>

IR #	Reviewer's Comment	Baffinland's Response
	<p>2) The Proponent should provide additional context on whether alternative thresholds were considered that could reduce the temporal overlap between the use of the Tote Road and Steensby Railway.</p>	<p>2) Baffinland considered requiring a minimum of 36,000 tonnes/day to be met for 30 consecutive days, however, elected to require an average over 30 days to allow for potential variations in movement and to be less restrictive.</p>
GN IR 05	<p>The GN recommends/requests the following:</p> <p>1) The Proponent should provide information on the anticipated time (including minimum and maximum time estimates) required to bring the railway up to the proposed commercial transportation rate following its construction.</p> <p>2) The Proponent should provide a graphic illustrating estimated timelines for the temporally inter-dependent phases of the project (i.e., railway financing, authorization and construction, railway attainment of commercial transportation rates, phasing out of Tote Road use, and the shipping period for evacuation of remaining ore from Milne Inlet). This graphic should include minimum and maximum estimates in months (as appropriate).</p> <p>3) The Proponent should clarify whether the 2 years for evacuating remaining ore from Milne Inlet is an activity that will occur prior to the December 31, 2032, expiry date</p>	<ol style="list-style-type: none"> <li>1. Baffinland would likely target a period of 6 to 12 months to reach the commercial transportation rate following the completion of initial infrastructure commissioning.</li> <li>2. Baffinland will consider the merits of preparing a graphic of this nature for future presentations on SOP2 (for example at the NIRB technical meeting and/or community roundtable) but does not agree that this item is necessary to move to the technical comment stage of the NIRB reconsideration process.</li> <li>3. This activity may occur prior to the December 31, 2032, expiry date, or for a period after that date if commercial transportation rates are achieved. See reference at page 20 of the FEIS Addendum, below:           <p style="margin-left: 40px;">“After December 31, 2032, the maximum total volume of all ore shipped via Milne Inlet in a calendar year returns to 4.2 million tonnes per year, unless</p> <p style="margin-left: 40px;">this condition has been further modified under section 112 of the Nunavut Planning and Project Assessment Act, S.C. 2013, c. 14, s. 2.</p> <p style="margin-left: 40px;">or</p> <p style="margin-left: 40px;">the Proponent achieves commercial transportation rates along the Steensby railway. If commercial transportation rates are achieved, the Proponent may</p> </li> </ol>

IR #	Reviewer's Comment	Baffinland's Response
		<p>evacuate any iron ore located at Milne Port by ship over a period of no more than two consecutive shipping seasons. After the completion of such evacuation, shipment of iron ore via Milne Port shall cease.”</p> <p>Based on the above wording, if commercial transportation rates are not achieved until the end of 2032, Baffinland would have the following two shipping seasons in 2033 and 2034 to ship the iron ore remaining at Milne Port to its customers.</p>
GN IR 06	<p>The GN requests/recommends the following:</p> <p>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.</p> <p>2) The Proponent should provide a series of maps showing all incidental caribou sightings made by Baffinland employees or contractors and all HOL-based observations from 2013 to 2023, by year. Symbology should be used in these maps to distinguish these two types of observations.</p> <p>3) The Proponent should provide maps, tables or other results to specifically demonstrate how Baffinland's site-specific monitoring activities (e.g., HOL survey, snow tracksurveys, incidental observations and the 2023 aerial survey) show that caribou distribution and numbers are possibly increasing.</p>	<p>1) This information is provided in Section 9.3.2 of the 2023 Terrestrial Environment Annual Monitoring Report and described in Chapter 8, Section 8.1.6 of the SOP2 FEIS Addendum. No caribou were observed in the PDA during HOL surveys in 2023, consistent with results from 2014-2023. Caribou were last seen during HOL surveys in 2013. This trend has been consistent (year-over-year) despite changes to survey procedures (i.e., increased survey time/effort) and supplementary/ancillary data capture (e.g., via deployment of remote cameras).</p> <p>2) This information is provided in Section 9.6 of the 2023 Terrestrial Environment Annual Monitoring Report and described in Chapter 8, Section 8.1.6 of the SOP2 FEIS Addendum. Incidental caribou sightings are generally consistent, with the most caribou observed in exploration areas southeast of the Project in summer, generally during helicopter transport. There have been more sightings within proximity to the Mine Site and Tote Road in recent years. These incidental observations and their locations are consistent with the results of the 2023 aerial caribou survey, also described in the 2023 TEAMR and Chapter 8.1.6 of the SOP2 FEIS Addendum. Baffinland does not believe a series of maps is required to support the GN's technical review.</p>

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	<p>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.</p>	<p>3) As described in the above information requests, caribou monitoring programs are summarized current to 2023 in Chapter 8, Section 8.1.6 of the SOP2 FEIS Addendum. Additional detailed and current information related to Baffinland's caribou monitoring programs can be found in the 2023 Terrestrial Environment Annual Monitoring Report (TEAMR). Attachment 3.5 of the SOP2 FEIS Addendum provides a reference index for all 2023 Annual Report to NIRB files and their associated registry numbers to facilitate access for reviewers. The 2023 TEAMR can be found by searching for NIRB registry numbers 349734; 349735; 349736 and 349737. This is an acceptable method of providing reference and access to Baffinland's Annual Monitoring Reports to NIRB, which would otherwise complicate the composition and volume of documents on the SOP2 registry.</p> <p>4) Baffinland and its technical experts have received the GN's most recent caribou collar data consistent with the terms of our data sharing agreement. Following an initial review it was determined the sample size was too low and the coverage period too short to yield any useful information for management purposes. Further, there was little to no interactions between the collared caribou and the general Project area, inclusive of the zone of interest. Baffinland does plan to provide a more detailed review of the collar location results with reference to the Mary River zone of influences through our annual monitoring cycle.</p>
GN IR 07	<p>The GN requests/recommends the following:</p> <p>1) The Proponent should provide context regarding how data on interannual variation in ice conditions, such as that presented in tables 1.5 to 1.6 of the IS Addendum, is/will be used to plan the arrival dates of the first and last ore ships each year.</p>	<p>1) Historical ice conditions provide a high level target to plan for the commencement and closure of each years shipping season, however, those dates are refined based on more current and local information as it is gathered, analysed and reported to Baffinland.</p> <p>2) Key shipping season dates are provided in multiple forums following the completion of each shipping season, including meetings of the Marine Environment Working Group, which the GN is a member of. Baffinland</p>

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	<p>2) The Proponent should provide, for each year of ore shipping from Milne Inlet to date, a table showing the arrival dates of the first and last ore ships at the boundary of the northern shipping route prior to the vessels transiting to Milne Port. For ships that arrived but were unable to immediately commence passage along the northern shipping route due to ice conditions, the Proponent should provide the date they arrived, as opposed to the date they began passage along the northern shipping route.</p>	<p>has not previously provided a summary table to outline all key shipping season dates for all shipping years and does not believe this is required to support the GN's technical review. In general, Baffinland's shipping season has commenced anywhere between mid-July and the first two weeks of August, depending on ice conditions. Similarly, the shipping season has ended anywhere between the second week of October and the very end of the month based on ice conditions. Baffinland and vessel captains generally aim to have vessels arrive at the entrance of Eclipse Sound at the same time they are expected to be able to enter the system and navigate towards a reserved anchorage. Delays at the beginning of the shipping season can see vessels waiting for up to a week before being allowed entry into the system. It is at the vessel captain's discretion to determine the safest place to harbour during those periods and not at the discretion of Baffinland to identify those areas outside of the marine RSA.</p>
GN IR 08	<p>The GN request/recommends the following:</p> <p>1) The Proponent should clarify which version of the TEMMP will be implemented during the SOP2 project. If a revised TEMMP is being prepared, the Proponent should clarify whether/when this document will be available to intervenors, and during which stage of the NIRB's review of the IS Addendum.</p>	<p>The TEMMP provided on the SOP2 record is the most recent version and is being applied to the currently approved 6 Mtpa operation. Following the completion of the SOP2 reconsideration the TEMMP will be updated as needed. For clarity, the TEMMP referenced has NIRB registry number 349407.</p>
GN IR 09	<p>The GN requests/recommends the following:</p> <p>1) The QIA provide details of the study design, methodology, and schedule.</p> <p>2) The QIA indicate whether these findings will be implemented during the life of the SOP2 Project.</p>	<p>IR directed at QIA, no Baffinland action required.</p>

IR #	Reviewer's Comment	Baffinland's Response
	<p>3) The QIA, if applicable, provide examples from the literature or other sources where similar studies may have been done before.</p>	
GN IR 10	<p>Sections 8.3.6 and 8.3.7 of the IS Addendum provide summaries of caribou mitigation measures. Understanding exactly how and when these mitigation measures will be implemented is critical in reviewing the accuracy of the assessment conclusions. The GN notes that many of these mitigation measures arose from commitments made by the Proponent during the NIRB's reviews of the PIPR (2022) and SOP (2023).</p> <p>These commitments are detailed in Tables 1 and 2 of Appendix B in the current Project Certificate No. 005 (NIRB, 2023). Given the passage of time, specific details of these measures should be available for the review of the IS Addendum. For brevity, the GN has articulated these specific requests in the section below</p> <p>The GN requests/recommends the following:</p> <p>Table 1 – Commitment #2</p> <p>1) The Proponent should clarify when and how 'guiding animals away from worksites' would be implemented.</p> <p>2) The Proponent should clarify what criteria will govern the decision to guide caribou away.</p>	<p>The comments and questions related to PC005, Appendix B, Table 1, Commitment #002 are copied from the Terrestrial Environment Mitigation and Monitoring Plan, which has been submitted on the SOP2 record for review. The mitigations outlined in this commitment were developed and approved through the NIRB's review of the original 2012 FEIS and again through the 2013 Early Revenue Phase FEIS Addendum. Baffinland will consider the comments provided here and through the remainder of the review in additional updates to the TEMMP, should SOP2 be approved.</p> <p>The comments and questions related to PC005, Appendix B, Table 1, Commitment #064 and Table 2, Commitment #014 should be directed at QIA as well as Baffinland, in particular question #011. In response to questions #12-#16 and #18, Baffinland has attached as Attachment 7 of this submission, three decision hierarchies in practice related to tote road traffic, blasting and helicopter operations. In relation to question #17, there have not been any shutdowns of the road to date based on the tote road traffic decision hierarchy due to the lack of caribou interaction with the Project within the described distances.</p>

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	<p>3) The Proponent should clarify whether caribou will be guided away to allow Project activities (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>	

IR #	Reviewer's Comment	Baffinland's Response
	<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 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>	

IR #	Reviewer's Comment	Baffinland's Response
	<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>	
GN IR 11	<p>The GN requests/recommends the following:</p> <p>1) The Proponent should provide an assessment of the potential for public use of the Tote Road during the SOP2 Project to increase and whether this could become an important pathway to future effects with respect to North Baffin caribou</p>	<p>There is no aspect of the SOP2 that Baffinland is aware of which reasonably connects to any potential for significant change in the public use of the Tote Road as compared to current use. As it is currently, under SOP2 public use of the Tote Road would continue to be facilitated by Project managed transportation of individuals and equipment between Milne Port and Mary River. No additional assessment is required.</p>
GN IR 12	<p>The GN requests/recommends the following:</p> <p>1) Please indicate the correct date that the latest version of the CHRPP replaces. Also, please confirm whether the March 7, 2016, version is the latest version of the plan for consideration.</p>	<p>The most recent version of the Cultural Heritage Resource Protection Plan is from March 7, 2016.</p>
GN IR 13	<p>The GN requests/recommends the following:</p> <p>1) Please include references to all of the years archaeological work has been carried out for the Mary River Project;</p>	<p>1) Baffinland has carried out archaeological work in the following years: 2007, 2008, 2010, 2012, 2013, 2014, 2015, 2016, 2018, 2019, 2023 and 2024.</p> <p>2) Current to 2023 there were 272 registered archaeology sites, minus 4 that were proven to be non-cultural, for a total of 268 sites. Additional</p>

IR #	Reviewer's Comment	Baffinland's Response
	<p>2) Provide the current number of archaeological sites recorded (2006-2024) within the Mary River Project footprint (from Milne to Steensby Inlet);</p> <p>3) Work closely with the project archaeologist to update the information provided in this section.</p>	<p>archaeological work carried out in 2024 is in the process of being reported to the Department of Culture and Heritage as required under our authorization and may be disclosed later in the review process at the request of the Territorial Archaeologist.</p> <p>3) Baffinland appreciates our working relationship with the Territorial Archaeologist and will work with them as appropriate with respect to the SOP2 reconsideration and in the development of the 2024 Archaeological Site Status Report.</p>
GN IR 14	<p>The GN requests/recommends the following:</p> <p>1) References to all archaeological work between 2006 and 2024 should be included in the current CHRPP. Refer to the 2023 Archaeological Site Status Report and project archaeologist for any necessary additions.</p>	<p>Baffinland will make necessary revisions to the Cultural Heritage and Resource Protection Plan should they be required following the completion of the SOP2 reconsideration.</p>
ON IR 01	<p>There has been a shift in this assessment reporting to include the cumulative effects assessment within each Valued Component (VC) section. These assessments are missing the estimates of confidence of the significance findings for each VC. This is common practice and should be included in the assessments of each VC. In addition, a summary of all findings from each section should be included in the Cumulative Effects section. Ideally, a matrix should show each how each mitigation measure reduces the predicted impacts on the VC, provide references for the conclusion (which is sometimes provided in associated chapters), and provide a level of confidence in those conclusions. Oceans North appreciates the complexity that a cumulative effects</p>	<p>Incorporating the cumulative effects assessment within each Valued Component (VC) chapter provides a more integrative assessment and negates the need to remind the reader of residual effects of the project since the analysis of residual effects of the project and combined residual effects of SOP2 and Approved Project immediately precede the cumulative effects assessment. Within each VC chapter (Assessment of SOP2 Residual Effects), VC-specific mitigation is summarized as it influences the prediction of residual effects. Since the cumulative effects assessment incorporates residual effects of the project, application of these mitigation measures is implied. Repeating project-specific mitigation measures in the cumulative effect summary is not necessary. Where there is uncertainty in effects predictions or data gaps identified, these areas of uncertainty are identified and follow-up and/or monitoring is proposed as applicable.</p>

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	assessment entails; providing a matrix summary in the cumulative effects section will reduce the amount of back and forth through the document.	<p>As noted in Section 6.11.2.4 of the SOP2 FEIS Addendum there is limited potential spatial overlap between SOP2 and other projects and activities. Where overlap of residual effects was predicted to occur, the cumulative effect of SOP2 in combination with the Approved Project and other projects and activities was predicted to remain not significant. The confidence in prediction of cumulative effects is high for all VCs. This confidence rating is primarily due to the certainty of residual effects predictions (owing primarily to ongoing monitoring programs which have been conducted while the 6 Mtpa operation has been in effect since 2018) and the limited overlap of effects from other projects and activities. Mitigation applied to reduce Project-specific effects is sufficient to address potential cumulative effects and no new mitigation is proposed to address cumulative effects. These mitigations are described in each VC chapter and summarized in Table 17.1.</p> <p>Additionally, a near-term initiative that will enhance the ability of communities to identify and propose responses to potential cumulative effects will occur through the QIA's Inuit Stewardship Plan, including completing a Cultural Resources and Land Use (CRLU) Assessment to establish the scope and contents of the CRLU Monitoring Program. Baffinland also agrees to participate in regional government initiatives and programs including federal initiatives aimed at evaluating regional cumulative effects in the Eastern Canadian Arctic and a marine spatial planning exercise should an appropriate regional body lead the initiative.</p>
ON IR 02	<p>There is inconsistency between the SOP and the SOP2 regarding the statements on cumulative effects.</p> <p>The SOP (p.247) states: "Compared to the PIP, PIPE and PIP Renewal applications, the SOP represents a longer-term application of increased activity levels along the Northern Transportation Corridor and this</p>	<p>The ERP Addendum (2013) assumed that Milne and Steensby ore shipping would occur in parallel for the life of the Mary River Project. The NIRB issued a positive recommendation on the ERP, the Minister approved the ERP and Project Certificate Amendment No. 1 was issued on that basis. The SOP2 Addendum incorporates this previous assessment.</p> <p>As for details on the manner in which the SOP2 assumes a potential overlap with construction and operation with the southern railway route and port and</p>

IR #	Reviewer's Comment	Baffinland's Response
	<p>CEA assumes potential temporal overlap with construction and operation with the previously approved southern railway and Steensby Port. The SOP, which is based on maintaining a nominal rate of 6 Mtpa level of operations is predicted to result in reversible, short-term to medium-term residual effects that fall within the overall temporal scope of the Approved Project and well within the 75-year CEA temporal boundaries.”</p> <p>The SOP2 (pg. 154) states: While SOP2 essentially represents a temporal extension of the previously approved SOP, it is important to acknowledge that the PIP, PIPE, PIP Renewal and SOP applications were considered short-term approvals (i.e., regarding the duration that applied). Assessment of cumulative effects with the Approved Project in those applications would not have considered a potential temporal overlap with the previously approved Steensby Railway and Steensby Port.</p> <p>Compared to the PIP, PIPE, PIP Renewal and SOP applications, SOP2 represents a longer term application of sustained 6 Mtpa activity levels along the Northern Transportation Corridor and this CEA considers temporal overlap with construction and limited operation with the previously approved Steensby Railway and Steensby Port.</p> <p>We propose that the proponent clarify the manner in which the SOP assumed a potential overlap with construction and operation with the southern</p>	<p>accounts for cumulative impacts, please see the SOP2 Addendum, Section 6.9, “Assessment of Combined Project Effects” starting at page 140:</p> <p style="padding-left: 40px;"><i>“As indicated in Figure 6.1, following an assessment of effects of SOP2 components and activities, this SOP2 FEIS Addendum evaluates the combined effects of SOP2 with effects of the Approved Project. This part of the effects assessment focuses on Steensby Components of the Approved Project which were previously approved but not constructed and which are now predicted to overlap with the SOP2 scope of activities. A description of Approved Project activities and components is provided in Section 2.3.1 to provide context for this assessment. A summary of residual effects predictions from past assessments for the Approved Project (e.g., FEIS, ERP FEIS Addendum, SOP FEIS Addendum) is presented for each VC, followed by an assessment of combined effects of SOP2 with the Steensby Components of the Approved Project. Future certain (e.g., Deposits 2 and 3) and likely foreseeable (Deposits 4 to 9) development by Baffinland is addressed under the CEA (Section 6.11).”</i></p> <p>Additional details on the overlap of activities are provided in the SOP2 FEIS Addendum Section 6.11.2.2. Here the spatial and temporal boundaries of the cumulative effects assessment are described with a specific outline of pre development, construction, operation and closure activities for each of the distinct northern and southern components.</p> <ul style="list-style-type: none"> <li>• <i>Pre-development/Definition Phase: 2004-2012</i></li> <li>• <i>Construction Phase:</i> <ul style="list-style-type: none"> <li>• <i>Original Mary River Project/ERP: 2013-2015</i></li> <li>• <i>PIP: 2018-2019</i></li> <li>• <i>Steensby Components: within 2025-2032</i></li> </ul> </li> <li>• <i>Operation Phase:</i> <ul style="list-style-type: none"> <li>• <i>ERP: 2014-2018</i></li> <li>• <i>PIP/PIPE/PIPR/SOP: 2018-2024</i></li> </ul> </li> </ul>

IR #	Reviewer's Comment	Baffinland's Response
	<p>railway route and port and accounted for cumulative impacts.</p> <p>Alternatively, we propose that the proponent clarify the manner in which the SOP2 assumes a potential overlap with construction and operation with the southern railway route and port and accounts for cumulative impacts.</p>	<ul style="list-style-type: none"> <li>• <i>SOP2: 2025-2032</i> <ul style="list-style-type: none"> <li>▪ <i>Post SOP2: Upon achievement of Steensby commercial transportation rates per Section 1.3 – 2032-2051)</i></li> </ul> </li> <li>• <i>Closure: 2051-2054</i></li> <li>• <i>Post-Closure Phase: 2054-2069</i></li> </ul>
ON IR 03	<p>Oceans North is concerned with this statement from Table 11.17: “Baffinland’s monitoring data of recorded land-use at the Project site suggests Inuit land use and harvesting coexists with the Project to some degree, in general. Through the IIBA, Baffinland provides compensation for Inuit hunters and harvesters impacted by the Mary River Project through the Wildlife Compensation Fund, which is administered by the QIA. Mitigation and monitoring commitments associated with the Approved Project will be implemented for SOP2 and future activities and components associated with the Mary River Project (where applicable) and will serve to reduce adverse cumulative effects on Culture, Resources and Land Use. “</p> <p>Based on the significance conclusions of the Marine Environment and Terrestrial Environment VCs – the primary pathways for potential effects to Inuit Culture, Resources, and Land Use, cumulative effects on this VC are predicted to be not significant. Tables in Section 11 provide a summary of the cumulative effects on Inuit culture and the human environment.</p>	<p>See SOP2 Addendum, Section 6.10 “Determination of Significance” starting at page 141, subheading “Consideration of Inuit Views on Significance” starting at page 142 for the requested details.</p>

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	<p>Please provide details on how significance was determined, including how Inuit provided input on the concept of significance.</p>	
<p>ON Cover Letter Fact Check No. 1</p>	<p>"We remain concerned that the proponent in its SOP2 submission indicates that, alongside the continued operation of its road and Port outlet at Milne Inlet, it intends to build the Steensby Railway and Port "sometime during the next eight years" (Sustaining Operations Proposal 2, August 2024 at p. 26) without providing any information as to when and how it intends to update the environmental impact analyses filed over 12 years ago (and based on datasets that in some instances are significantly older)."</p>	<p>This statement requires a fact check, as it implies that Baffinland is proceeding with the Steensby Components based on the outcomes of the 2012 FEIS only. This is not the case.</p> <p>Baffinland has confirmed several times, in writing, that Baffinland will not be relying on the 2012 FEIS data sets only, and that it has undertaken a number of additional baseline studies since 2020 to support permitting requirements and other conditions before construction of the Steensby Component of the Project can begin. See for example SOP2 Addendum, Table 5.3 Summary of Baffinland Terms and Conditions and Commitments related to Environmental Management, Row 1, Page 124 for a list of updated datasets.</p>
<p>ON Cover Letter Fact Check No. 2</p>	<p>"The proponent continues to make statements such as the following "the Steensby Rail and Port are not part of this Application for approval because they are already approved under the Project Certificate issued by NIRB in 2012" (ibid. at p. 26). Oceans North disagrees that the approval issued in 2012 <b>(relying on proponent filings that, at the time, were materially deficient in that the proponent failed to disclose its plans for Milne Inlet and the tote road)</b> can be relied upon to shield the proponent from the obligation to account for the anticipated industrial development in its entirety within Nunavut's</p>	<p>This statement requires a fact check. As a general comment, participants in the NIRB process have the responsibility to act as responsible advocates and to provide information that is truthful and otherwise adhere to all relevant NIRB guidelines and rules of procedure.</p> <p>This is a matter that is easily confirmed from even a cursory review of key Project documentation available on from the NIRB registry. A road haulage option was included in the core project description of the Draft Environmental Impact Statement and following the decision in 2011 not to pursue the option, it was still considered in the Final Environmental Impact Statement in the Assessment of Alternatives (Volume 3, Section 6.7.2) and the Cumulative Effects Assessment (Volume 9, Section 1.3.2.7) (NIRB Registry ID 285309).</p>

IR #	Reviewer's Comment	Baffinland's Response
	environmental assessment regime." [emphasis added]	<p>In short, Baffinland's decision not to pursue NIRB approval of the road haulage operation in 2011 was made considering the results of a feasibility study, the implications to the Project's development schedule, and alignment with the new majority owner, ArcelorMittal, corporate objectives and business planning. For more details on the rationale behind this decision, please see FEIS, Volume 3, Section 6.7.2.</p> <p>While Baffinland issued notice in early 2013 of its intent to pursue the Early Revenue Phase following the approval of the original Project in late 2012, it is important to note that the ERP FEIS Addendum did not follow until mid-2013. The decision and associated rationale to pursue the ERP was clearly outlined at the time and since that time - changing economic and financial circumstances required a pivot from the plan presented and approved as part of the original Project. The only alternative at the time was to not develop any part of the Project, which would have denied Inuit the immense benefits the Project has delivered to date. The plans for Milne Inlet and the Tote Road were subject to a full NIRB process, including information requests, technical comments, technical meetings, community roundtable and a final public hearing, and did not proceed until it was approved at the end of the public processes established by the Nunavut Agreement.</p>
ON Cover Letter Fact Check No. 3	"The 2012 environmental impact assessment of the proposed project did not take into account the anticipated cumulative effects of the Milne route and the Steensby route in the aggregate nor could it take into account actual effects of an operating mine and transportation corridor."	<p>This statement requires a fact check, as it omits or mischaracterizes key relevant information, as follows.</p> <p>As noted above, a road haulage option was included in the core project description of the Draft Environmental Impact Statement and following the decision in 2011 not to pursue the option, it was still considered in the Final Environmental Impact Statement in the Assessment of Alternatives (Volume 3, Section 6.7.2) and the Cumulative Effects Assessment (Volume 9, Section 1.3.2.7).</p>

IR #	Reviewer's Comment	Baffinland's Response
		<p>Milne Inlet and Steensby ore shipping occurring in parallel was precisely the proposal the NIRB considered in the Early Revenue Phase Assessment (supported by the 2013 ERP FEIS Addendum) and approved with the issuance of Project Certificate Amendment No. 1.</p> <p>Lastly, no assessment of a greenfield project can “take into account actual effects of an operating mine and transportation corridor”. This statement does serve to highlight the accuracy that is possible under the SOP2 FEIS Addendum, given that it can rely on actual monitoring data for the exact activity looking to be approved. The SOP2 FEIS Addendum is unique in that it looks to sustain an operation that has been operated since 2018 and approved by the NIRB and Federal Minister on four separate occasions.</p>