

Table 2. Baffinland Response to NIRB Staff IRs of Sept. 26

NIRB IR #	Subject Topic	Reference	Issue/Concern	Information Request	BIM Response
NIRB-01	Spatial boundaries of shipping activities	Sections 6.2 and 6.11.2.2; Attachment 4.2	Spatial boundaries of the shipping activities do not appear to be included in the SOP2 IS Addendum.	Please provide a location of the spatial boundaries associated with the continued shipping activities to assist in determining the Project’s potential impacts on the particular biophysical or social phenomenon being addressed in the IS Addendum.	<p>SOP2 does not propose any changes to the shipping activities that were previously approved by NIRB under the original Project Certificate and Amendments No. 1 to No. 5. They only change to shipping activities proposed by SOP2 is to continue to operate at up to 1.8 mpta above the 4.2 mpta approved by NIRB in 2014 (which is a Northern transportation rate that has been in place under the Project Certificate since 2018).</p> <p>The spatial boundary of the shipping corridors is provided in the SOP2 FEIS Addendum, Chapter 6, Section 6.2 ‘Spatial and Temporal Boundaries’, Figure 6.2 (see page 132). Figure 6.2 “Spatial Boundaries” is also included in the List of Figures appended to the SOP2 FEIS Addendum Table of Contents.</p> <p>Additional maps related to the shipping corridors are located in SOP2 FEIS Addendum, Attachment 1.11, Figures 4 (Northern Shipping Corridor) and 6 (Southern Shipping Corridor)</p> <p>The location of the requested information is also outlined in the Table of Concordance (Attachment 1.3) in relation to Guideline Section 5.4.1 (page 11).</p>
NIRB-02	Longer term strategic implications of the	Section 2.1, pages 29-37	The NIRB was unable to identify where discussions were included on the longer term strategic implications of the Project, and how it may affect or lend to	Please provide a summary of the longer term strategic implications of the Project and how it may affect or lend to transportation networks (existing and proposed) in Nunavut.	<p>SOP2 does not propose any new infrastructure, nor does it propose any modifications to any constructed or approved Mary River Project infrastructure. It only proposes to continue to use constructed and approved Mary River Project infrastructure.</p> <p>Nonetheless, to assist NIRB staff in orientation to the history of the Mary River Project, discussion of longer-term strategic implications of the Project and its relation to transportation infrastructure is included in Chapter 2, Section 2.1, at the bottom of Page 36, specifically:</p>

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	Project related to transportation networks (existing and proposed)		transportation networks (existing and proposed) in Nunavut, as the SOP2 proposal may assist in creating a transportation network in the summers for other vessels to transit through.	If this information was provided in the IS Addendum, please reference the section.	<p>“The SOP2 also continues to contribute towards other original purposes of the Project, including the development of transportation infrastructure in a remote region of Canada where little currently exists, and to contribute to Canada’s northern strategy to strengthen Canada's sovereignty. Current users of the LSA, RSA and/or project infrastructure include land users for the purpose of carrying out traditional activities (see Attachment 3.2) and organizations with mandates or interest in local or regional monitoring, which Baffinland supports with in-kind contributions of logistical support (the Government of Nunavut, Government of Canada, Universities and the Qikiqtani Inuit Association have all made use of the Mary River Project for this purpose). The territorial and federal governments (including the military) could make use of marine, land and air based transportation infrastructure in the future to support a multitude of activities, including those that protect Canada’s Arctic sovereignty. Finally, following closure there could be opportunistic use of the area and remaining infrastructure to support tourism and research.”</p> <p>The location of the requested information is also outlined in the Table of Concordance (Attachment 1.3) in relation to Guideline Section 5.6 (page 12).</p>
NIRB-03	Future users of the Local Study Area (LSA), Regional Study Area (RSA) and the Project Infrastruct	Section 2.1, pages 29-37	Information regarding future users of the LSA, RSA and project infrastructure do not appear to be provided in the SOP2.	Can Baffinland provide a summary and/or location to where in the IS Addendum it has identified future users of the LSA, RSA and Project Infrastructure, including commercial, government, public and private, especially the use of the Milne Inlet Port by future users.	<p>The SOP2 does not propose any changes to the Milne Port. The NIRB previously assessed and approved use of the Milne Port for project resupply as part of the original approval in 2012, and use of the Milne Port for ore transport in 2014.</p> <p>It is explicitly acknowledged throughout the SOP2 FEIS Addendum that Inuit have used the Project area and will continue to use the Project area in future, and mitigations have been designed through engagement with Inuit to limit negative impacts on Inuit use. Specific discussion of future users of the LSA, RSA and Project infrastructure is included in Chapter 2, Section 2.1, at the bottom of Page 36, specifically (see quote at NIRB-02, above).</p>

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	ure				<p>The location of the requested information is also outlined in the Table of Concordance (Attachment 1.3) in relation to Guideline Section 5.6 (page 12).</p> <p>The Milne Port is already constructed and operating. There are no changes to Milne Port proposed as part of SOP2.</p>
NIRB-04	Public consultation and Inuit Knowledge - Presentation of traditional knowledge (TK) collected related to coastal areas and ice conditions	Sections 10.1.9, 11.1.0, 11.1.13 and Attachment 3.2	The NIRB notes that information presented in Attachment 3.2 was collected prior to 2018. As the proposed SOP2 is to continue shipping through the Northern Transportation Route, the NIRB would like to understand where inclusion of updated TK was included.	Please provide a summary of how TK collected during monitoring was incorporated in the SOP2 project proposal. Can Baffinland also state if additional TK was collected related to coastal areas and ice conditions since 2018.	<p>It is important for NIRB staff to note that as a result of the original NIRB approval in 2012 and ERP approval in 2014, shipping is already approved to continue through the Northern Transportation Route. SOP2 seeks to modify the Project Certificate to permit Baffinland to continue the 1.8 mtpa increase over ERP rates in place since 2018.</p> <p>The topic of IQ/TK The integration of TK and IQ was a key focus in the SOP2 FEIS Addendum overall. See in particular Chapter 3, “Inuit Qaujimajatuqangit and Inuit Engagement” (page 50-100).</p> <p>How IQ and community knowledge have been incorporated into SOP2 is detailed in Chapter 3, Section 3.1.2 ‘Incorporating IQ into the FEIS, Project Amendments and Operations’. Section 3.1.2 is comprehensive and, among other things, includes a summary of information sources considered for the Mary River Project in Table 3.3. The table includes the years the information was collected and is current to the date of the SOP2 FEIS Addendum submission.</p> <p>More recent Inuit Qaujimajatuqangit and community knowledge shared with Baffinland regarding the marine environment is further provided in the assessment of the marine environment at Chapter 10, Section 10.1.9 ‘Community Statements Shared with Baffinland’. Baffinland can confirm there are observations related to both coastal erosion and sea ice conditions in those sections.</p>

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					The location of the requested information is also outlined in the Table of Concordance (Attachment 1.3) in relation to Guideline Sections 6.2 (general integration of TK in planning and design, page 15) and 8.1.12.1 (TK specific to coastal areas and ice conditions, page 47).
NIRB-05	Public consultation and Inuit Knowledge - Presentation of information resulting from community Inuit Qaujimajatuqangit studies regarding identified Valued Ecosystem Components (VECs)	Sections 4.3, 10.1 and 18	The NIRB was unable to locate where discussion was provided in the IS Addendum about selected VECs from community Inuit Qaujimajatuqangit studies including: the relative seasonal and annual trends in abundance and distributions; the estimated productive capacity; migratory patterns and associated corridors/routes; critical habitats on or in proximity of shipping routes; and sensitive periods.	Please provide a summary on how monitoring data resulting from community Inuit Qaujimajatuqangit studies were incorporated in the VECs including the relative seasonal and annual trends in abundance and distributions; the estimated productive capacity; migratory patterns and associated corridors/routes; critical habitats on or in proximity of shipping routes; and sensitive periods.	<p>Inuit Qaujimajatuqangit and community knowledge stemming from Baffinland’s ongoing monitoring and engagement activities are broadly and specifically described in detail throughout Chapter 3. This information is presented as relevant within each Valued Component assessment, with specific reference to Sections 7.1.4, 8.1.7, 9.1.4, 10.1.9 and 11.1.3, all titled ‘Community Statements Shared with Baffinland’.</p> <p>Chapter 6 outlines the Impact Assessment Approach and Methods used to develop the SOP2 FEIS Addendum. Sections relevant to the NIRB’s request include 6.3 ‘Scoping of Valued Components’, 6.4 ‘Indigenous Rights’ and 6.6 ‘SOP2 Interactions and Pathways of Effects’. This Chapter also provides reference to Attachment 4.2 ‘FEIS Assessment Methodology’, where Baffinland’s approach to the integration of information gained through Inuit Knowledge Studies is included at Section 3.4.</p> <p>Per Baffinland’s IRs to participants in the SOP2 review, Baffinland has encouraged the sharing of community IQ studies so that they can be considered in its ongoing monitoring and other activities relating to the Mary River Project.</p>

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NIRB-06	Reference to documents that are specific to Phase 2 Proposal	Attachment 5.1	The Proponent refers to Attachment 5.1 for the design and application of multiple scenarios on impact assessment; however, Attachment 5.1 is specific to the Phase 2 proposal and not the SOP2.	Can Baffinland confirm that this is the correct diagram in Attachment 5.1 since it references the Phase 2 Development Proposal.	<p>Confirmed the diagram is correct. Attachment 5.1 was included in the SOP2 FEIS Addendum submission as it contains an assessment of climate change that is independent of specific project features. Section 3 of the attachment contains the assessment, which is referenced and included within the SOP2 FEIS Addendum as appropriate.</p> <p>Baffinland is clear about the document’s relationship to Phase 2 within the body of the SOP2 FEIS Addendum at Chapter 7, Section 7.2.1 prior to summarizing the relevant findings, where it states:</p> <p><i>“The potential climate change effects in the High Arctic were summarized in the 2018 Technical Supporting Document (TSD) 06 Climate Change Assessment (Appendix 5, Attachment 5.1) Phase 2 Proposal (Baffinland 2018a):</i></p> <ul style="list-style-type: none"><li><i>• Arctic land surface temperatures have increased substantially since the mid 20th century, and the future rate of warming is expected to be greater than the global rate</i></li><li><i>• Sea ice extent has decreased in the past decades, and the Arctic Ocean is projected to become nearly ice free in summer within this century</i></li></ul> <p><i>...”</i></p> <p>The NIRB information request references a diagram without a specific reference within Attachment 5.1. In the absence of the required reference, Baffinland can broadly affirm the figures within Attachment 5.1 are correct and relevant to the SOP2 FEIS Addendum regardless of their dual application or relevance to the previously assessed Phase 2 Proposal.</p>

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NIRB-07	Procedures for managing and mitigating potential spillage of ore fines on the Tote Road and at the Milne Inlet Port Site	Section 2.3.11	The NIRB could not find information on mitigating potential spillage of ore fines on the Tote Road within the IS Addendum.	Can Baffinland identify which management plan (and version) that discusses the mitigation measures in place for potential spillage of iron ore fines on the Tote Road.	<p>This specific IR and guideline requirement is of limited to no relevance to the scope of SOP2. The SOP2 does not propose any changes to the mitigation measures currently in place. The requested management plan references are provided in Chapter 2, Section 2.3.1.1 on Page 41 specifically. With respect to the procedures for responding to the potential spillage of ore fines along the tote road specifically is in the Emergency Response Plan, Section 5.4.9 ‘Vehicle Incidents’.</p> <p>The location of the requested information is also outlined in the Table of Concordance (Attachment 1.3) in relation to Guideline Section 6.5.2 (page 16).</p>
NIRB-08	Tote Road operation and maintenance	Section 2.3	The NIRB was unable to locate information about the ongoing maintenance of the Tote Road for the duration of the SOP2 proposal.	Can Baffinland identify which management plan (and version) that describes the ongoing maintenance planned for the Tote Road for the duration of the SOP2 proposal.	<p>This specific IR and guideline requirement is of limited to no relevance to the scope of SOP2. The SOP2 does not propose any changes to current maintenance practices applicable to the Tote Road. The Roads Management Plan (NIRB Registry ID 349403) describes operating procedures for routine road maintenance and the maintenance of water crossings.</p> <p>The location of the requested information is also outlined in the Table of Concordance (Attachment 1.3) in relation to Guideline Section 6.5.2 (page 16) and Section 9.4.18 (page 65).</p>
NIRB-09	Baseline information collection from other literature	Section 18	Baffinland only provided references in the IS Addendum and it is not clear how this recent baseline information from the	Please describe how did Baffinland validated the baseline section(s) in the IS Addendum? How did Baffinland use monitoring data?	How Baffinland characterized the biophysical and socio-economic setting and the existing conditions for each Valued Component is described under the Impact Assessment Approach and Methods Chapter (Chapter 6), Section 6.5 ‘Existing Conditions’. Within Chapter 6 there is further reference to Attachment 4.2 ‘FEIS Assessment Methodology’, which further outlines how baseline studies are incorporated in the SOP2 FEIS Addendum, specifically Section 3.3.3 ‘Baseline Studies’.

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	and reports		Baffin region was incorporated.		Relevant monitoring data was integrated in the Existing Environment Section within each VC chapter, namely Section 7.1, 8.1, 9.1, 10.1 and 11.1, where reference to recent monitoring reports are included, whenever available.
NIRB-10	Identify natural fluctuations, trends, and cyclical and other recurrent phenomena to baseline data	Sections 4, 7 through 11	Baffinland has collected information on operations of the Mary River Project since 2014 related to natural fluctuations, trends, and cyclical and other recurrent phenomena in the region.	<p>Can Baffinland summarize how it included monitoring data into the verification of 2014 data for the SOP2 IS Addendum?</p> <p>Specifically, applied to identify natural fluctuations, trends, and cyclical and other recurrent phenomena.</p>	<p>Verifying 2014 or any other single year of data against subsequent monitoring results is not a requirement or relevant to the development of the SOP2 FEIS Addendum and by extension unnecessary for its reconsideration.</p> <p>It is important to acknowledge that this topic will continue to be considered via the NIRB monitoring process, which is a parallel process to SOP2. Topics relating to the operating project already addressed in NIRB monitoring processes should continue to be addressed in that forum. The requested information, including trend analysis, natural cycles, etc. is generally contained in Baffinland's Annual Report to NIRB. That information has been pulled and summarized with the SOP2 FEIS Addendum as appropriate, with additional references and NIRB Registry Numbers provided for reviewers to access the most recent monitoring reports where additional detail or context is desired.</p> <p>As identified in relation to NIRB-09, how Baffinland characterized the biophysical and socio-economic setting and the existing conditions for each Valued Component is described under the Impact Assessment Approach and Methods Chapter (Chapter 6), Section 6.5 'Existing Conditions'. In that section it is indicated that <i>"the description of existing conditions for each VC characterizes current conditions up to the most recently available annual reporting year"</i>.</p>
NIRB-11	The effect on capacity of resources to meet	Sections 6.10, 7 through 11	The NIRB is unable to locate information regarding how the effect on capacity of resources to meet present and future	Can Baffinland describe where consideration of the effect of capacity of resources to meet present and future needs was applied in Significance Determination.	The effect on the capacity of resources to meet present and future needs considered as part of the residual effects criteria outlined in Chapter 6, Section 6.8 and Table 6.3. The relevant criteria include magnitude and reversibility. Magnitude considers the period of recovery (moderate magnitude) or more long-lasting effects (high magnitude). Reversibility considers the likelihood that a VC or Indicator will recover from an environmental effect.

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	present and future needs		needs as part of the Significant Determination for the Impacts Statement Addendum.		
NIRB-12	Potential impacts to natural drainage patterns from operation of mine facilities		The NIRB was unable to locate information related to impact to natural drainage patterns from operation of mine facilities.	Can Baffinland provide a summary of where the potential impacts to natural drainage patterns from the operation of the mine facilities including the Tote Road and the Milne Inlet Port was included in the IS Addendum for the proposed SOP2.	<p>This specific IR is of limited to no relevance to the scope of SOP2. SOP2 does not propose to add or modify any existing Project infrastructure that would alter the natural drainage patterns as already presented, reviewed and approved through the FEIS and ERP FEIS Addendum. Baffinland does not believe this information is relevant to the current reconsideration.</p> <p>Existing conditions related to surface water are detailed at Chapter 9, Section 9.1.1.3 and the potential effects of freshwater quantity and quality are detailed at Chapter 9, Section 9.2.1.</p>
NIRB-13	Potential impacts of ongoing exploration activities on surface water quality		The combined effects of ongoing exploration on surface water quality and the proposed ongoing shipping of the ore as proposed for the SOP2 needs to be considered as part of the IS Addendum.	Can Baffinland provide a summary on where it described the potential impacts of ongoing exploration activities on surface water quality combined with the potential effects of the proposed shipping for the SOP2 project proposal.	<p>This specific IR and guideline requirement is of limited to no relevance to the scope of SOP2. Baffinland is not proposing any changes to exploration as a result of SOP2. Baffinland does not understand the referenced link between potential effects of regional exploration in the freshwater environment and a marine environment activity such as shipping. For clarity, there are no exploration activities in marine areas nor any exploration activities that occur near areas where shipping will occur.</p> <p>The potential cumulative effects on freshwater quantity and quality between SOP2 (inclusive of shipping) and Baffinland’s mineral exploration programs is considered in Chapter 9, Section 9.7 ‘Assessment of Cumulative Effects’ and in Table 9.6.</p>



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NIRB-14	Relationship between permafrost processes and active layer, surface waterbodies and topography	Section 9.1.1.2	A discussion on the relationship between permafrost processes and active layers, surface water bodies and topography does not appear to be included within the IS Addendum. This would be included to determine the potential impacts from the ongoing shipping through the Northern Transportation Route and the continued use of the Tote Road to Milne Inlet Port.	Please provide a summary of where the relationship between permafrost processes and active layers, surface water bodies, and topography for the Tote Road and the Milne Inlet Port as it is being proposed to be used for at least the next eight (8) years for the proposed SOP2 was considered.	<p>This specific IR and guideline requirement is of limited to no relevance to the scope of SOP2. Baffinland does not propose any changes to the Tote Road or the Mile Port as part of SOP2. There are no changes of approach to protection of permafrost, surface water bodies or topography. The use of these facilities for project resupply was assessed and approved in 2012 and for the additional activity. Of ore transportation in 2014. Continuing use of the Tote Road and Milne Port is already approved for the life of the Project. SOP2 does not propose to add or modify any existing Project infrastructure that would alter permafrost dynamics as already presented, reviewed and approved through the FEIS and ERP FEIS Addendum</p> <p>With respect to the continued 1.8 mtpa transportation along the Northern Transportation Corridor that is the focus of SOP2, Baffinland does not understand the suggested link between permafrost and ongoing shipping through the Northern Transportation Corridor.</p> <p>Below is a summary of references to areas of the SOP2 FEIS Addendum that discuss the Projects potential effects on permafrost and the inverse potential effects of permafrost on the Project.</p> <p>Existing conditions related to ground/permafrost stability are detailed at Chapter 8, Section 8.1.1 and the potential effects of SOP2 on ground/permafrost stability are detailed at Chapter 8, Section 8.2.1.</p> <p>Further to the above, the predicted effects of the environment on the Project are discussed at Chapter 13 where changes permafrost and how these changes may affect various environmental components are discussed, with further reference provided to Chapter 7, Section 7.2.1 Climate Change.</p>

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					The location of the requested information is also outlined in the Table of Concordance (Attachment 1.3) in relation to Guideline Section 8.1.6.1 and 8.1.6.2 (page 41), including the 'Notes' section that indicates there is no new or modified infrastructure and this information is not required, even though some references are provided.
NIRB-15	Details regarding the suitability of topsoil and overburden for use in the re-vegetation of surface-disturbed areas	Sections 4.3, 8.1.1 and 8.1.3	Within the IS Addendum, Baffinland noted that as the SOP2 proposal does not involve any new Project Development areas, and that information on current conditions for landforms, soil and permafrost can be found in the 2023 NIRB Annual Report.	Please provide the Document ID number for materials/ reports etc that Baffinland is referencing on the NIRB's Public Registry to describe the current conditions for landforms, soil, and permafrost.	<p>Consistent with the original rationale provided in the Notes column of the Table of Concordance, SOP2 does not propose to add or modify any existing Project infrastructure that relates to landforms, soils and permafrost as already presented, reviewed and approved through the FEIS and ERP FEIS Addendum. Baffinland does not believe this information is relevant to the current reconsideration.</p> <p>The location of the requested information is outlined in the Table of Concordance (Attachment 1.3, page 42) in relation to Guideline Section 8.1.7.1, including the 'Notes' section that indicates the following:</p> <p><i>"SOP2 does not involve any new Project Development Areas; baseline data is provided in the FEIS/ERP. Information on current conditions for landforms, soil and permafrost can be found in the 2023 NIRB Annual Report (Section 4.6.6; 4.6.8 and Appendix G.5) (as referenced in Attachment 3.5). A summary of current conditions is provided in the SOP2 FEIS Addendum in Sec 4.3, 8.1.1, 8.1.3."</i></p> <p>Attachment 3.5 '2023 Annual Report to the NIRB (Reference Index)' provides specific NIRB Registry Numbers to assist reviewers in finding relevant monitoring information related to various VC's and other components of the SOP2 FEIS Addendum. In the preamble to the Table of Concordance (Attachment 1.3, page 1) there are clear instructions as to how Attachment 3.5 should be used by reviewers, as follows:</p> <p><i>"Where relevant, a summary of monitoring results has been presented to characterize existing conditions for applicable VCs. For interested reviewers, the most recent monitoring results can be found in the 2023 Annual Report to the NIRB (refer to</i></p>

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					<i>Attachment 3.5 for details).</i> "
NIRB-16	Discussion of the potential for soil erosion, including stream bank erosion, resulting from surface disturbances associated with the construction, operation, and maintenance of Project components	Sections 7.2.1, 7.3.3, 8.7 and 9.2.2	The Proponent stated that no new construction would be required for SOP2 and therefore discussions related to soil erosion and stream bank erosion were not included in the IS Addendum. The NIRB notes that even though the SOP2 proposed activities do not include new construction, information is not limited to construction activities but also include operations and maintenance activities.	As the Proponent is monitoring through the operation and maintenance of the Mary River Components, can Baffinland summarize what it would be using related to all erosion events in the SOP2 project proposal should the proposal be approved?	<p>SOP2 does not propose to meaningfully change operations or maintenance requirements along the Tote Road already presented, reviewed and approved through the FEIS and ERP FEIS Addendum. Baffinland does not believe this information is relevant to the current reconsideration.</p> <p>Erosion is the subject of substantial discussion in Chapter 9 and carried through Sections 9.1.1.3, 9.1.2, 9.2.2, 9.2.3, 9.3.1.2, 9.3.2, 9.3.4, 9.4, 9.7 and Table 9.2.</p> <p>Sedimentation and erosion control measures are contained within the Surface Water and Aquatic Ecosystem Management Plan (SWAEMP). This is described in Chapter 9, Section 9.3.2 as referenced above and also found in the Table of Concordance (Attachment 1.3) in relation to Guideline Sections 8.1.6.1 and 8.1.6.2 (page 41). These approved management plans will continue to apply to SOP2, if approved.</p>

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NIRB-17	Details regarding vegetation species that are valuable for cultural reasons known to Inuit	Section 8.1.7	In review of the IS Addendum, information was not located regarding the vegetation species that are valuable for cultural reasons known to Inuit. As noted previously, the NIRB understands that the SOP2 proposal is not proposing any new construction but would be a continuation of an existing amendment until 2032 and therefore Baffinland would be monitoring vegetation, including vegetation species that are valuable for cultural reasons known to Inuit.	Can Baffinland provide a summary of where it discussed vegetation species that are valuable for cultural reasons known to Inuit and/or how it updated and/or validated data used for the SOP2 proposed? Please include where mitigation and monitoring plans (version) that would be used for SOP2 if approved.	<p>Culturally important vegetation is discussed in Chapter 8, Section 8.2.3 as well as 8.1.7. The location of the requested information is also outlined in the Table of Concordance (Attachment 1.3) in relation to Guideline Section 8.1.8.1 (page 43).</p> <p>Mitigation and monitoring plans related to vegetation, including culturally important vegetation, are described in the Terrestrial Environment and Mitigation Plan (TEMMP). This Plan is available on the NIRB Public Registry for SOP2 and the NIRB Registry ID is provided in Chapter 5, Section 5.1, Table 5.1 (NIRB Registry ID – 349407).</p>
	Assessment of the	Sections	As the Mary River Project is in operations and the proposed SOP2 would continue until 2032, it is	Can Baffinland summarize where it discusses the assessment of potential loss,	The assessment of potential effects to vegetation, including culturally important vegetation, is in Chapter 8, Sections 8.1.3, 8.2.3, 8.3.3, 8.4 (Table 8.3), 8.5 (Table 8.4), 8.6 and 8.7. This is indicated in headings listed in the SOP2 Addendum Table of Contents.

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NIRB-18	potential loss, disturbance and/or changes to vegetation abundance	8.1.3, 8.2.3 and 8.5	important to understand the assessment of the potential loss, disturbance and/or changes to vegetation abundance that have been observed since the start of operations. This includes consultation conducted to find out how Inuit are perceiving the potential effects of the project on vegetation.	disturbance and/or changes to vegetation (including species that are of importance to Inuit culturally and traditionally.	The location of the requested information is also outlined in the Table of Concordance (Attachment 1.3) in relation to Guideline Sections 8.1.8.1 and 8.1.8.2 (page 43).
NIRB-19	Potential impacts on wildlife from vehicle traffic on the Tote	Sections 8.2.5, 8.2.6, 8.3.5, 8.3.6 and 8.3.8	As the proposed SOP2 would be looking at extending the timeline of transportation, it is important to understand how potential impacts on caribou recovery from very low abundance as influenced by the filter/barrier effects of the physical road structure and road	Can Baffinland summarize where the potential impacts on wildlife from vehicle traffic along the Tote Road associated with the SOP2 proposal are described?	<p>There are no changes to the physical Tote Road structure proposed in SOP2. The traffic associated with SOP2 is at similar levels to that under the previous production increase proposals approved by NIRB in 2018, 2020, 2022 and 2023.</p> <p>The potential effects of SOP2 on wildlife are summarized in Sections 8.2.5 and 8.2.6. The potential residual effects of the existing, SOP2, combined and cumulative effects after the application of mitigations are discussed in Section 8.4, 8.5, 8.6 and 8.7 respectively.</p> <p>The location of the requested information is also outlined in the Table of Concordance (Attachment 1.3) in relation to Guideline Section 8.1.10.2 (page 46).</p> <p>The significant measures that Baffinland has undertaken based on engagement with</p>

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	Road year-round		<p>traffic on movement and migration.</p> <p>Additionally, information on direct and indirect loss of habitat, the conduct of project activities, and associated sensory disturbances and dust fall accumulation on forage resulting from anthropogenic sources are important.</p>		<p>Inuit and regulatory authorities in order to manage dust fall at the operating project are summarized in Chapter 7, “Atmospheric Environment” and in particular 7.3, “Monitoring and Mitigation Measures”, starting at page 176.</p>
NIRB-20	Potential impacts on wildlife from injury or mortality caused by Project activities, including intentional killing to defend human life or	Sections 8.2.5 and 8.2.6	<p>It did not appear that the IS Addendum had information on impacts to wildlife, particularly the use of the Tote Road, mine hauling roads, and other access roads associated with the proposed SOP2, as Project infrastructure would continue to be in operation until at least 2032 and potentially</p>	<p>Baffinland should summarize how it incorporated the potential impacts on wildlife from injury or mortality caused by Project activities from the use of the Tote Road, mine hauling roads, and other access roads, as well as information on intentional killing of wildlife to defend the human life or property by mine personal into the SOP2 proposal.</p>	<p>Continued use of the Tote Road and other mine roads was previously assessed and approved by NIRB in 2014. The SOP2 proposes only to maintain transportation along the Northern Transportation Corridor at the 1.8 mtpa rates above approved ERP rates that have been in place under the Project Certificate since 2014.</p> <p>Injury and mortality caused by SOP2 activities, namely the sustained traffic rates of a 6 Mt operation, are considered in the same references provided in response to NIRB-19.</p> <p>The SOP2 does not include any additional pathways that could result in the heightened risk of defensive kills. The most likely wildlife interaction to result in a defensive kill is with polar bears. Baffinlands Polar Bear Safety Plan is available on the NIRB’s Public Registry for SOP2 and outlined in Chapter 5, Section 5.1, Table 5.1. The applicable NIRB Registry Number is 350945.</p>

NIRB IR #	Subject Topic	Reference	Issue/Concern	Information Request	BIM Response
	property		longer for the proposal.		
NIRB-21	Assessment of potential contaminant loading in sea water and ice from dust plume settlement at the port site	Sections 10.2.2 and 10.2.3	The NIRB was unable to locate information about the potential contaminant loading in sea water and ice from dust plume settlement at the Milne Port site in the IS Addendum. As the proposed SOP2 would be continuing until at least 2032, it is important to identify if there would be any effects from extending the use of the Milne Inlet Port site for shipping of iron ore, as well as transportation of iron ore to the port site.	Please provide a summary of potential contaminant loading in sea water and ice from dust plume settlement at the port site from the transportation and offloading of iron ore for the SOP2 proposal.	<p>The assessment of ore dust dispersion/deposition from stockpiles and during ship loading at Milne Port is considered throughout Chapter 10, including in Section 10.1.2, 10.2.2, 10.2.3, 10.4, 10.5, 10.6 and 10.7.</p> <p>The location of the requested information is also outlined in the Table of Concordance (Attachment 1.3) in relation to Guideline Sections 8.1.12.1 and 8.1.12.2 (page 47).</p>