


	Polar Bear Safety Plan	Issue Date: March 7, 2016	Page 1 of 23
	Environment	Revision: 1	Document #: BAF-PH1-830-P16-0041


Baffinland Iron Mines Corporation

Polar Bear Safety Plan

BAF-PH1-830-P16-0041

Rev 1

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	Polar Bear Safety Plan	Issue Date: March 7, 2016 Revision: 1	Page 3 of 23
	Environment	Document #: BAF-PH1-830-P16-0041	

TABLE OF CONTENTS

1	INTRODUCTION.....	5
1.1	REGULATORY REQUIREMENTS	5
1.2	CHANGES TO MANAGEMENT PLAN.....	6
2	ROLES AND RESPONSIBILITIES.....	6
2.1	ENVIRONMENTAL MANAGER.....	6
2.2	ENVIRONMENTAL SUPERINTENDENT.....	6
2.3	SAFETY SUPERINTENDENT	6
2.4	EMERGENCY MANAGEMENT TEAM LEAD (EMTL)	7
2.5	SECURITY PERSONNEL.....	7
2.6	DEPARTMENTAL SUPERVISORS	7
2.7	BAFFINLAND EMPLOYEES AND CONTRACTORS	8
2.8	POLAR BEAR MONITOR.....	9
3	POLAR BEARS.....	9
3.1	POLAR BEAR BEHAVIOUR.....	10
	3.1.1 Curious Behaviour	10
	3.1.2 Defensive Behaviour.....	10
	3.1.3 Predatory Behaviour.....	10
4	POLAR BEAR ACTION LEVELS.....	11
4.1	POLAR BEAR ACTION LEVEL I	11
4.2	POLAR BEAR ACTION LEVEL II	11
4.3	POLAR BEAR ACTION LEVEL III	11
5	EDUCATION AND TRAINING.....	12
6	SITE LAYOUT AND OPERATIONS.....	12

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	Polar Bear Safety Plan	Issue Date: March 7, 2016 Revision: 1	Page 4 of 23
	Environment	Document #: BAF-PH1-830-P16-0041	

6.1	SITE DESIGN AND LAYOUT	13
6.1.1	Lighting Systems.....	13
6.1.2	Building Exits.....	13
6.1.3	Vigilant Workers.....	13
6.1.4	Polar Bear Monitors.....	14
6.1.5	Perimeter Sweeps.....	14
6.2	LIMITING POLAR BEAR ACCESS.....	14
6.3	POLAR BEAR-RESISTANT STORAGE.....	14
6.4	FOOD AND Waste MANAGEMENT	14
6.5	SEWAGE AND WASTEWATER.....	15
6.6	SNOW REMOVAL.....	15
6.7	BEACHED CARCASS REMOVAL	15
6.8	REGULAR MAINTENANCE AND SAFETY CHECKS	16
6.9	COMMUNICATIONS / POLAR BEAR WARNINGS	16
7	DETERANCE AND HAZING.....	16
7.1	POLAR BEAR DETERRANCE TRAINING.....	16
7.2	HAZING/DETERRENCE PRINCIPALS.....	17
7.2.1	When to Use Deterrents	17
7.2.2	Effectiveness	18
7.3	HAZING/DETERRENCE TOOLS AND TECHNIQUES	18
7.3.1	Visual Deterrence	18
7.3.2	Noise Deterrence.....	18
7.3.3	Physical Deterrence	19
7.4	DETERRENTS TO BE KEPT ON-SITE.....	19
7.4.1	12 gauge shotgun	19
7.4.2	RG-46 pistols, cartridges, screamers and bangers	19
7.4.3	Bear pepper spray	19

The information contained herein is proprietary to Baffinland Iron Mines Corporation and is used solely for the purpose for which it is supplied. It shall not be disclosed in whole or in part, to any other party, without the express permission in writing by Baffinland Iron Mines Corporation.

Note: This is an UNCONTROLLED COPY. All staff members are responsible to ensure the latest revision is used.

	Polar Bear Safety Plan	Issue Date: March 7, 2016 Revision: 1	Page 5 of 23
	Environment	Document #: BAF-PH1-830-P16-0041	

7.4.4	Long range acoustic device (LRAD).....	19
7.5	POLAR BEAR BEHAVIOR AND DETERRENCE	19
8	BEAR INTERACTION PROCEDURES	20
8.1	INTERACTION AVOIDANCE PROCEDURE	20
8.2	DEFENSIVE KILL PROCEDURE	21
9	POLAR BEAR REPORTING AND RECORD KEEPING	23
10	IMPLEMENTATION/EVALUATION/FEEDBACK	23

1 INTRODUCTION

Baffinland Iron Mines Corporation (Baffinland) is committed to conducting all aspects of its business in accordance with the principles outlined in the “Sustainable Development Policy” (refer to Appendix A). Baffinland recognizes polar bears as an important ecological component of Baffin Island and their significance to the Inuit culture. Accordingly, Baffinland shall manage all operations with a view of minimizing negative impacts to polar bears while ensuring the safety of human life while protecting assets.

Polar Bear encounters at the Mary River Project pose an immediate threat to life, health, safety, environment and property. Therefore, the Polar Bear Safety Plan (Plan) is to be used in conjunction with Baffinland’s Emergency Response Plan (Doc. #: BAF-PH1-830-P16-0007) which provides the following guiding principles:

- Ensure the safety and well-being of personnel, the environment, and property;
- Identify the types of emergencies that may occur and the procedures to respond, intervene, stop, or limit the emergency situation;
- Ensure effective communication between personnel and the mine rescue team; and
- Ensure that personnel responding to emergencies are trained and have appropriate resources for the response.


All Baffinland employees and contractors are required to comply with the requirements provided in this Plan.

1.1 REGULATORY REQUIREMENTS

Polar bears are protected in Canada where they are legally hunted. Seasons, protected categories and quotas apply. The purpose of the Wildlife Act (statute of Nunavut) is to establish a comprehensive regime for the management of wildlife and habitat. The legislation provides that it is legal for anyone to attempt to deter, and if necessary destroy, a bear in defence of life or property. Any bear killed must be reported to the nearest conservation officer. It is an offense to allow the hide of a polar bear to spoil.

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	Polar Bear Safety Plan	Issue Date: March 7, 2016 Revision: 1	Page 6 of 23
	Environment	Document #: BAF-PH1-830-P16-0041	

This Plan has been developed and implemented to ensure that Baffinland respects all applicable laws, regulations, and requirements from federal and territorial authorities along with the agreements (Inuit Impact and Benefit Agreement, September 6, 2013), directives (refer to Appendix B for QIA Directive 2013-1-17-2), and authorizations required for operations.

1.2 CHANGES TO MANAGEMENT PLAN

The Polar Bear Safety Plan has been updated to reflect changes in Baffinland's organization at the site level in addition to new guidance directives (refer to Appendix B for QIA Directive 2013-1-17-2). The QIA directive is of the utmost importance and must be followed in the unfortunate event of a defensive kill of a polar bear. With an increase in Baffinland personnel, refinements have been made to the emergency response roles and responsibilities which in turn provide the direction for Baffinland personnel in the event of a Level III polar bear response. Regular updates to this plan shall be made to reflect continual management reviews, incident investigations, regulatory or other changes as prescribed.

2 ROLES AND RESPONSIBILITIES

2.1 ENVIRONMENTAL MANAGER

The Environmental Manager shall ensure the Polar Bear Safety Plan is evaluated and revised yearly or as required to reflect changes made to permits, directives, and authorizations required for operations. The Environmental Manager or his/her designate may also solicit suggestions for ways to improve upon this Plan from its employees, contractors, community groups as well as other concerning stakeholders.

2.2 ENVIRONMENTAL SUPERINTENDENT

The Environment Superintendent or designate shall ensure periodic hazard assessments concerning potential Polar Bear attractants are performed. He or she shall also facilitate site visits by various stakeholders and provide liaison with regulatory authorities concerning Project operations and Baffinland's polar bear management policies and procedures.


Should a polar bear be killed in defense of life or property, the Environment Superintendent or designate is responsible for providing the immediate notification to appropriate authorities and ensure that all prescribed activities (timely handling, preparation and skinning of the carcass) are completed in accordance with QIA Directive 2013-1-17-2 (Appendix B). He or she must also ensure that only authorized personnel perform field dressing, gutting, skinning, and cutting the carcass in addition to ensuring that the meat and other usable parts do not spoil prior to being delivered to the designated community in accordance with the QIA Directive.

2.3 SAFETY SUPERINTENDENT

The Safety Superintendent shall ensure that periodic checks are completed to ensure concordance among this Plan and the Emergency Response Plan in the event of prescribed Code 1 Emergency Response

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	Polar Bear Safety Plan	Issue Date: March 7, 2016 Revision: 1	Page 7 of 23
	Environment	Document #: BAF-PH1-830-P16-0041	

Procedures. The Safety Superintendent will ensure that adequate training is provided to personnel and that training program is updated to reflect successive revisions to the Emergency Response Plan (Code 1 Emergency Procedures)(refer to Baffinland’s Emergency Response Plan, 2016) where activated, Level III Polar Bear responses initiate a Code 1 Emergency Response.

2.4 EMERGENCY MANAGEMENT TEAM LEAD (EMTL)

The Emergency Management Team Lead (EMTL) will be the most senior operations manager present at the site where an emergency is declared and will work closely with the Environmental Manager and Environmental Superintendent to ensure compliance with Baffinland’s Environmental Policies and Procedures in the event of a polar bear encounter. At the Mary River site, the Vice-President Operations, or designate will be the EMTL. At Milne Port, the EMTL will be the most senior operations manager at the site.

It is the responsibility of the EMTL to initiate a Code 1 Emergency Response at his or her discretion upon notification of a polar bear sighting within 8 km from camp sites (Level I) or work areas.

If a polar bear be sighted within 1.5 km of an accommodations complex or work area (Level II) the EMTL is required to activate the Management Command Center. Depending upon the situation and associated risks, he or she may decide to activate a Code 1 Emergency Response at this time; however, when a polar bear is sighted at an accommodations complex or work area (Level III), the EMTL must immediately activate the Code 1 Emergency and are responsible for ensuring that the Emergency Response Plan is followed.

2.5 SECURITY PERSONNEL


Security personnel shall provide support to Baffinland’s Environment Department in the investigation of suspicious activities regarding the intentional/unintentional feeding of wildlife as well as reports of polar bears in close proximity to the camps. When required, Security Personnel shall assist during polar bear encounters and appropriate hazing activities.

2.6 DEPARTMENTAL SUPERVISORS

Baffinland Departmental Supervisors are responsible for the management of their employees and response to the risks of their activities being completed when Polar Bear Action Levels I and II have been activated. Upon the activation of Action Level I and II responses, Departmental Supervisors are responsible to initiate the appropriate actions such as restricting work activities according to the associated risks. Supervisors or crews are not permitted (or expected) to work in conditions where the presence of a polar bear on site would subject them to risk of injury. Upon activation of a Level III polar bear response, supervisors are responsible for ensuring that all employees under their supervision adhere to the Code 1 procedures (stand down of activities) and are accounted for.

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	Polar Bear Safety Plan	Issue Date: March 7, 2016 Revision: 1	Page 8 of 23
	Environment	Document #: BAF-PH1-830-P16-0041	


2.7 BAFFINLAND EMPLOYEES AND CONTRACTORS

Proper worker conduct is imperative to the effectiveness of this Polar Bear Safety Plan and to the initiation and completion of effective Emergency Response Procedures as they pertain to Polar Bear response activities at the Mary River Project. All Baffinland employees and contractors are required to understand that while continual efforts are being made by Baffinland to create a culture of safety and respect of our people, wildlife and the environment in which we work and live, individuals must also take personal responsibility for avoiding encounters with polar bears. All workers on the Mary River Project shall:

- Attend safety training and comply with Baffinland's policies and procedures established for polar bear interactions;
- Comply with Baffinland's Code 1 Procedure upon activation of a Level III Polar Bear Emergency Response (i.e. stand-down);
- Take personal responsibility for their safety and the safety of others;
- Be aware of the risks associated with working in areas where polar bear encounters are more likely to occur;
- Always look around before leaving a vehicle or buildings checking for polar bears outside doors, around stairs, corners of buildings, material storage, and especially around areas such as dumpsters or incinerators;
- Demonstrate extra caution while working outside during evening hours and hours of darkness, or when fog or blowing snow reduces visibility;
- Whenever possible remain within the lighted work areas;
- When a Polar Bear Monitor is assigned to a work group, remain within their line of sight when performing field work;
- Notify security and Environmental Superintendent (or designate) of a polar bear is sighted, regardless of the time of day;
- Avoid polar bear encounters and retreat to safety when appropriate;
- Never approach a polar bear or linger in exposed areas to take photographs;
- Drive carefully when wildlife is around -- wildlife has the right-of-way;
- Never feed any wildlife (the feeding of foxes, birds, polar bears, or any wildlife will not be tolerated);
- Operators must be responsible for the cleanliness of their vehicles and equipment (including pickup truck beds) - always remove food/garbage;
- Never litter or pour unfinished beverages (such as coffee, tea, juices or sodas) onto the ground; and
- Understand that disciplinary action will take place in the event of mishandled food/garbage that attracts animals and that the deliberate feeding of wildlife will lead to immediate dismissal and removal from site.

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	Polar Bear Safety Plan	Issue Date: March 7, 2016 Revision: 1	Page 9 of 23
	Environment	Document #: BAF-PH1-830-P16-0041	

2.8 POLAR BEAR MONITOR

In addition to the responsibilities shared by all Baffinland employees and contractors, continual observation by dedicated Polar Bear Monitors are completed for early detection of polar bear presence in the project vicinity where there is an anticipated risk of polar bear encounters. While human safety is paramount, it is vitally important to emphasize that early detection and avoidance measures are designed to prevent encounters that have the potential to result in harm to humans and polar bears; therefore, the early detection of polar bears is the Polar Bear Monitor's primary responsibility.

When assigned to guard a work crew, the Polar Bear Monitor shall instruct all workers to remain within his or her line-of-sight. Anyone moving out of the line of sight will be instructed to rejoin the work group or when appropriate, the work group shall be relocated to the site of the worker under the circumstances.

Upon finding polar bear signs or sighting a polar bear, the Polar Bear Monitor must notify the on-site Security Supervisor or duty manager. The Polar Bear Monitors must continually watch the polar bear while it is in the project vicinity.

Upon notification by Baffinland employees and/or contractors of polar bear sightings or interactions to the designated Polar Bear Monitor and the on-site Security Supervisor or camp manager, the Polar Bear Monitor is responsible for the investigation of polar bear tracks or polar bears approaching any of the project's work sites and may be assigned to guard work crews. If trained to do so, and upon authorization, he or she may be required to haze and deter the polar bear (refer to Section 7 - Deterrence and Hazing).

3 POLAR BEARS

Polar bears are the largest member of the bear family. They are strong, fast and agile, on land or ice and are expert swimmers and divers. Their sense of smell is exceptional, their eyesight comparable to that of humans. Polar bears are naturally curious, not fearless as they have been labeled.


Polar bears can be found throughout Nunavut. In fall, winter and spring polar bears hunt ringed seals, their primary prey along the sea ice edge, near open water and areas of pushed up sea ice. They also hunt for seals in places where sea ice is thin or cracked, such as tide cracks in land-fast ice or at toes of glaciers. In summer polar bears are forced ashore when sea ice melts. They often travel along coast lines using points of land and rocky inlets near the coast to navigate. They also travel inland and have been seen as far as 150 km from the coast.

During the summer months polar bears will feed on birds, eggs, and small mammals along the coastlines, beaches and rocky islands near the coast. They will also scavenge anything from wildlife carcasses to human garbage. As predators, polar bears will investigate humans, their camps and may even consider humans as a food source.

The potential risk associated with polar bear encounters exists anywhere on Baffin Island. Although chance encounters are greatest at the coast, polar bear sightings have occurred at the Milne Inlet, Mary

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	Polar Bear Safety Plan	Issue Date: March 7, 2016 Revision: 1	Page 10 of 23
	Environment	Document #: BAF-PH1-830-P16-0041	

River and Steensby Inlet sites in recent years. Each polar bear encounter is unique, however good judgment, familiarity with polar bear behavior and sound actions are important in all situations.

3.1 POLAR BEAR BEHAVIOUR

Polar bears exhibit three main types of behavior (curious, defensive and predatory). Each type has its own distinct characteristics by which it may be able to ascertain the bear's motives and predict its actions.

3.1.1 CURIOUS BEHAVIOUR

A curious bear may circle downwind or stand on its hind legs to get a better scent. At closer range it may move slowly towards you with frequent stops. Its head and nose will be raised and its ears may be up or to the side as it tries to determine what you are. If the bear appears curious, stand your ground, act confidently, talk to it in a firm voice, and let it know you are human. When encountering a curious polar bear it is advised that people group together and use whatever noisemakers you have on hand. Normally the bear will move off once it has identified you as human. If you fail to stand up to it, a bear that is initially just curious or testing may decide you are food and become predatory.


3.1.2 DEFENSIVE BEHAVIOUR

A threatened bear will most likely appear agitated or stressed. It may use body language or sounds to try to make you stop or move away. Females often behave this way when defending their cubs. The bear will look directly at you its head lowered it may swing its head from side to side or it might suddenly lay its ears back and take a run at you, stopping short of contact. This is sometimes called a "bluff charge", but the bear is not bluffing. It's giving you a strong message to leave it alone. Failing to heed this warning can be extremely dangerous.

If you have accidentally surprised or crowded a bear, especially a female with cubs, stay calm and slowly move away from the bear. A little distance may be all that it wants. If a threatened bear moves toward you, it will usually stop its advance once you move far enough away, but sometimes the bear may make an aggressive lunge at you. If it does, stand your ground. This may be difficult as facing an aggressive bear will be terrifying. If it persists or attacks, respond as you would for a predatory attack.

3.1.3 PREDATORY BEHAVIOUR

A bear showing predatory behavior does not vocalize or give much warning. Neither does it exhibit signs of stress or fear. Seeing a potential meal, it stays intensely focused on you, with its ears erect and mouth open. If an approaching bear appears predatory, stand your ground. When encountering a defensive polar bear use a firm voice and let it know you are human. The more the bear persists the more aggressive you need to be. Group together and make lots of noise. If you have non-lethal deterrent rounds this is the time to use them. If not you must challenge the bear and make it back down. Arm yourself with whatever is at hand; make yourself look as big as possible. Stay together and continue to act aggressively. If all your aggressive displays and deterrents fail to stop the bear and it charges intent on attack, do not run. Instead

	Polar Bear Safety Plan	Issue Date: March 7, 2016 Revision: 1	Page 11 of 23
	Environment	Document #: BAF-PH1-830-P16-0041	

fight for your life. Kick, punch, or hit the bear with anything you can. Focus your attack on its nose and face. If you must shoot an attacking bear and are authorized to do so, shoot to kill.

4 POLAR BEAR ACTION LEVELS

4.1 POLAR BEAR ACTION LEVEL I

Activation of a Polar Bear Action Level I (lowest level) response will take place when a polar bear is sighted within 8 km of Mary River Project work sites/accommodations complexes and shall involve the following response activities:

- If safe to do so, the bear should be monitored by the personnel who spot it to try to ascertain the bear's direction of travel and security at the closest camp should be notified;
- Activation of the Management Command Center (MCC) is at the discretion of the EMTL; and
- The polar bear sighting must be reported immediately to the Environmental Superintendent or his/her designate, regardless of the time of day.

4.2 POLAR BEAR ACTION LEVEL II


Activation of a Polar Bear Action Level II (medium level) response will take place when a polar bear is sighted within 1.5 km of Mary River Project work sites/accommodations complexes and shall involve the following response activities:

- If safe to do so, the bear should be monitored by the personnel who spot it to try to ascertain the bear's direction of travel and to know its location;
- Security at the closest camp must be notified immediately;
- Depending on the situation, a Code 1 might be called; and
- Activation of the MCC is required by the EMTL.

4.3 POLAR BEAR ACTION LEVEL III

Activation of a Polar Bear Action Level III (highest level) response will take place when a polar bear is sighted at a Mary River Project work site or accommodations complex and shall involve the following response activities:

- Without delay, a Code 1 must be called immediately;
- All personnel in the area must immediately get to safety inside a vehicle or building; and
- Activation of the MCC and the Crisis Management Team is required by the EMTL.

	Polar Bear Safety Plan	Issue Date: March 7, 2016 Revision: 1	Page 12 of 23
	Environment	Document #: BAF-PH1-830-P16-0041	

5 EDUCATION AND TRAINING

Baffinland is committed to providing high quality, relevant training for employees. The goal of polar bear awareness training is to encourage safe behavior and promote a culture that embraces environmental and wildlife awareness, which in turn will minimize the impacts of project activities on polar bears and the surrounding environment.

All Baffinland employees, contractors and visitors will receive an overview on Polar Bear Safety as part of the site orientation package at the Mary River Project site upon arrival prior to commencing work activities. Orientation is provided at the Mary River and Milne Inlet site locations.

A major feature of the orientation will consist of viewing “Polar Bears: a Guide to Safety”. The video was a collaborative effort of the Safety in Bear Country Society with Inuit elders and others knowledgeable about staying safe in polar bear country.

Dependent upon specific job requirements, select project personnel will receive training in polar bear deterrence (refer to Section 7 - Deterrence and Hazing). This training, which has been developed and conducted jointly by Baffinland’s Safety and Training Department, will be provided to individuals who will be authorized to perform hazing operations to protect human health and welfare if necessary. Only properly trained and authorized personnel will have access to deterrents.

Personnel authorized to haze polar bears will be required to take annual refresher deterrence-training.

Baffinland utilizes the following approaches to provide and reinforce polar bear-related safety and conflict prevention messages to ensure that collectively all workers receive current and accurate information:

- Site orientation and Polar Bear Safety overview;
- Additional targeted training sessions as required;
- Refresher classes – annually for designated monitors/personnel authorized to haze;
- Safety meetings and daily safety memos – used to increase/reinforce awareness of polar bears, specific issues and how to avoid problems;
- Awareness posters around the Project accommodations and contractor trailers;
- Warning signs posted at facility exits identifying locations of elevated risk; and
- Periodic handouts with relevant sections of this Polar Bear Safety Plan.


6 SITE LAYOUT AND OPERATIONS

Baffinland shall incorporate the following elements into the design and operation of the Mary River project facilities to minimize the impacts of activities on polar bears and to reduce risks to people:

- Early detection of polar bears in the area through a combination of site design, Polar Bear Monitors, vigilant workers, and proper lighting;

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	Polar Bear Safety Plan	Issue Date: March 7, 2016 Revision: 1	Page 13 of 23
	Environment	Document #: BAF-PH1-830-P16-0041	

- Minimizing attractants and eliminating rewards by using polar bear -resistant storage for food, garbage, and hazardous substances, incineration of wastes, backhauling unburnable wastes, and enforcing bans on littering and feeding wildlife;
- Establish and assign clear roles and responsibilities (refer to Section 2.0) to quickly report polar bears sighted near or within project areas;
- Development of an effective and efficient communication system to notify responsible parties as required (Security, Environment Superintendent, EMTL, etc.);
- Authorizing, well-trained personnel to haze/deter polar bears in limited and necessary circumstances, using approved protocols.

6.1 SITE DESIGN AND LAYOUT

Basic design and layout considerations will help detect polar bears. Sight distances in the more heavily traveled areas (i.e. between the main camp entrance and main access points to other buildings) will be maximized as practical to reduce chances of surprise encounters and ambushes. Appropriate visibility will be maintained for the stretch of road leading to the structure (since polar bears often follow the path of least resistance and may walk up roads to facilities) as well as around dumpsters, incinerators, and sewage disposal units (odors might attract curious polar bears). The site layout will attempt to avoid dead end corners and alleys. A polar bear could get trapped if it is spooked or hazed into a blind alley that does not have an escape route, or a polar bear could corner a worker there.

6.1.1 LIGHTING SYSTEMS


Adequate lighting may have a deterrent effect on a wary polar bear but more importantly, bright lighting increases visibility and the likelihood that workers will see a polar bear if one is near. High use and potentially hazardous areas (doors, outdoor work areas, food/garbage storage sites, parking areas, dumpsters, incinerators, and other heavily used areas) shall be maintained illuminated during periods of darkness. Although lighting will assist workers in seeing polar bears that may be within the immediate area, these lights may not help spot distant polar bears; thus outdoor work areas shall be provided with additional lighting as required.

6.1.2 BUILDING EXITS

Exterior doors will be kept closed to prevent curious polar bears from entering buildings. Windows or CCD cameras may also be used on some doors to help detect polar bears outside them.

6.1.3 VIGILANT WORKERS

Baffinland recognizes that observant workers and Polar Bear Monitors are among the best ways to detect polar bears and are a crucial part of early detection efforts. Worker awareness shall be stressed during site orientation, environmental briefings, safety meetings, posters, and other ways to continually reinforce the requirement for vigilance.

	Polar Bear Safety Plan	Issue Date: March 7, 2016 Revision: 1	Page 14 of 23
	Environment	Document #: BAF-PH1-830-P16-0041	

Sightings by heavy equipment operators, security, and other personnel who spend a lot of time working in the field will also help locate polar bears. All Polar Bear sightings in the field and outside of Project site areas shall be reported to security immediately. Sighting information shall also be communicated to all personnel in the area.

6.1.4 POLAR BEAR MONITORS

Polar Bear Monitors shall be employed and trained to watch for approaching polar bears and monitor their movements when they are near facilities and work areas. Polar Bear Monitors shall be deployed to allow for continuous coverage. Work schedules and standard routines shall be adjusted as necessary to minimize fatigue to assist in maximizing the efficiency of the Polar Bear Monitors. The best lookout locations for Polar Bear Monitors will be assessed on a continuous basis as the facilities expand and lines of sights change. Lookout locations may also change to accommodate weather conditions.

6.1.5 PERIMETER SWEEPS

Polar Bear Monitors will regularly patrol the perimeter of the facilities scanning for polar bears and looking for evidence of their presence within the area. They will scan for polar bear tracks in the snow or on the ground and any tracks shall be reported to supervisors and investigated to ensure that the polar bear is not present within or near project site areas.

6.2 LIMITING POLAR BEAR ACCESS

Efforts shall be made at site facilities to limit polar bear hiding places. All buildings shall be placed on a pad or on insulating material. If raised, buildings shall be skirted (i.e. wire fencing) to prevent polar bears from using areas underneath as hiding places. Whenever practical, materials and equipment will be stored in ways that minimize potential hiding/ambush sites.

6.3 POLAR BEAR-RESISTANT STORAGE

Hazardous materials that could pose a threat to the health and safety of polar bears (such as glycol, lubricants, motor oil, fuel, and drilling mud with hydrocarbons) shall be stored to prevent polar bear access (i.e. inside buildings, sheds, drums, locking steel containers). Secure polar bear-resistant storage methods shall also be employed for handling food and garbage.

6.4 FOOD AND WASTE MANAGEMENT

Baffinland is committed to preventing wildlife from obtaining any unnatural food or waste at all project site locations and work areas. Polar bears that learn to associate human activity with food can not only become potentially dangerous, but are also at greater risk of being killed in other areas. Securing food and waste and enforcing company policy prohibiting any feeding of wildlife are the primary methods to reduce encounters and conflicts, and are reasonable and practical to achieve at a controlled, remote development such as the Mary River project. Preventing polar bears from developing bad habits is a priority. At Project site locations, food will be kept inside buildings and only permitted in vehicles,

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	Polar Bear Safety Plan	Issue Date: March 7, 2016 Revision: 1	Page 15 of 23
	Environment	Document #: BAF-PH1-830-P16-0041	

equipment and containers that minimize odors, for short periods, when workers are unable to use the dining facilities. Food (other than survival gear) or refuse will not be left in parked vehicles or equipment after a shift is over, and shall be disposed of properly.

Landfill dumpsters not resistant to polar bears shall be kept free of food and food waste. Incineration of food and food waste eliminates potential problems associated with polar bears. All food wastes that can potentially attract wildlife shall be incinerated daily on-site or stored temporarily in enclosed containers. Any non-burnable food waste shall be stored in enclosed containers for annual backhaul.

Food waste includes used cooking oil (not considered oily waste) and containers that have been used for food and beverages (i.e. lunch bags, paper plates, Styrofoam containers, plastic utensils, etc.). All of these items may contribute to polar bear problems if not disposed of properly.

Baffinland has a zero tolerance policy for feeding wildlife. Any worker caught feeding wildlife shall be removed from the project. There will also be serious consequences for carelessness with food disposal resulting in the indirect feeding of wildlife. Personnel will be reminded regularly that they should not litter, leave food and food waste in parked vehicles or pickup truck beds, throw garbage in scrap dumpsters, or pour out unfinished beverages (i.e. coffee) on to the ground.

6.5 SEWAGE AND WASTEWATER

Sewage and wastewater odors are potential attractants to polar bears. There have been instances of property damage and injury associated with improperly handled waste. The camp will be equipped with a wastewater treatment plant. Sewage sludge will be incinerated on-site regularly or stored in sewage treatment lagoons.

6.6 SNOW REMOVAL


Whenever possible, snow shall be kept clear around Project site area buildings and fences, and large berms that could conceal polar bears will not be created where they could pose a potential safety issue.

6.7 BEACHED CARCASS REMOVAL

Carcasses of marine or terrestrial animals may wash up along the shoreline near facilities and attract polar bears, creating a safety hazard. Depending on the type of animal involved, Baffinland's Environment Department is required to contact the appropriate agencies for removal and deposition of the carcass as soon as possible, alternatively, authorization may be provided to Baffinland to do so. Depending on the size and condition of a carcass, it may be towed offshore to be carried away by the current or removed in some other way. Baffinland shall follow the protocols of the responsible agency for dealing with beached carcasses to prevent them from attracting and feeding polar bears near the facility. Records of any such actions will be kept by the Environment Department and provided to the appropriate agencies annually or as requested.

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	Polar Bear Safety Plan	Issue Date: March 7, 2016 Revision: 1	Page 16 of 23
	Environment	Document #: BAF-PH1-830-P16-0041	

6.8 REGULAR MAINTENANCE AND SAFETY CHECKS

Where applicable, safety/security personnel will be responsible for checking the polar bear-resistant storage containers, and access controls (doors, cameras) to ensure they are functioning properly. They will report any problems to the appropriate maintenance staff, as well as ensuring polar bear-accessible doors are not propped open. Safety/security personnel will also investigate unusual activity exhibited by birds or foxes, which can indicate the intentional or unintentional feeding of wildlife.

6.9 COMMUNICATIONS / POLAR BEAR WARNINGS

Baffinland maintains concise communication protocols for polar bear encounters. Effective 2-way communication among all personnel on-site is an essential part of safely working in polar bear habitat. All personnel are required to notify the Polar Bear Monitor, security, or supervisors when they see a polar bear or evidence of a polar bear in the area. Supervisors, security personnel or Polar Bear Monitors will notify employees and contractor crews a polar bear's location and communicate with them regarding what actions shall be taken as well as when it is safe to resume work.

7 DETERRENCE AND HAZING

Baffinland employees and contractors shall operate within the prescribed guidance that authorizes designated personnel to deter polar bears from project facilities and areas of human activity under specified conditions. The intent of deterrence activities is to achieve a safer work environment for people and polar bears by discouraging a polar bear from displaying adverse behavior (such as approaching facilities or workers, or attempting to attain food and/or food waste). The major strategy employed by authorized project personnel is hazing; a form of deterrence to get a polar bear to move away, usually from work sites and facilities. It is in the best interests of human safety, as well as that of the polar bears, for polar bears to maintain a significant distance. The following sections describe the procedures for active deterrence and hazing method for polar bears.

7.1 POLAR BEAR DETERRANCE TRAINING


It is crucial to have well-trained individuals perform deterrence activities. Baffinland's Safety and Training Department personnel provide on-site training to project personnel annually or as required. A third party contractor may also be authorized if the training content is consistent with the training requirements and the trainer is accredited to deliver the program. Designated individuals will attain qualification to operate firearms as well as become familiar with the capabilities and limitations of the required tools. Practice with actual deterrents is crucial and field exercises are completed as part of training methods.

Deterrence Training includes the following topics:

- Regulatory issues;
- The Polar Bear Safety Plan;

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	Polar Bear Safety Plan	Issue Date: March 7, 2016 Revision: 1	Page 17 of 23
	Environment	Document #: BAF-PH1-830-P16-0041	

- Polar bear ecology;
- Polar bear behavior patterns;
- Preventing polar bear conflicts;
- Hazing/deterrence principles;
- Safe and appropriate use of wildlife deterrents;
- RG – 46 launchers;
- Remington model 870 shotguns;
- Capsaicin bear spray;
- Capabilities and limitations of deterrents;
- Hazing/deterrence techniques and protocols;
- Use of Satellite telephone and two way radios;
- Emergency numbers;
- Safe procedure for entering and exiting helicopters;
- Field safety;
- Accountability/reporting requirements;
- Report writing and required forms; and
- Wildlife deterrents live firing - range exercise.

7.2 HAZING/DETERRENCE PRINCIPALS

7.2.1 WHEN TO USE DETERRENENTS

Deterrents works best when other preventative strategies to keep polar bears from obtaining food and garbage rewards are implemented. The best scenario is to be prepared to use deterrents, but to not have to use them, letting a polar bear move on by the facility or through the area on its own while being monitored.

When and where deterrents are used will be determined by stipulations of the established protocols, and the best judgments of the person authorized to haze. All other options will be pursued before resorting to deterrents unless otherwise specified.


Deterrents should be used only for very specific, approved objectives and should never be used unnecessarily or out of frustration. If a polar bear in a non-emergency situation is to be hazed, the least intense methods will be used first.

Finesse is usually better than excessive force – just making a curious polar bear think twice about approaching people or entering facilities by moving a vehicle/helicopter or heavy equipment toward it may be enough to discourage it. Restraint in resorting to deterrent rounds and tools that are more serious is important. The desired result can often be obtained by less intensive methods.

There is no perfect deterrent, but there are many options and usually a combination of techniques used by a well-trained hazer with an understanding of polar bear behavior works well.

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	Polar Bear Safety Plan	Issue Date: March 7, 2016 Revision: 1	Page 18 of 23
	Environment	Document #: BAF-PH1-830-P16-0041	

7.2.2 EFFECTIVENESS

The effectiveness of deterrents is a function of whether or not the polar bear has been rewarded for a behavior in the past, and how strong its motivation and varies with conditions and/or context of the situation and associated risks. The most difficult animal to deal with is a very hungry, determined polar bear that has repeatedly gotten into food and garbage previously at a site. The easiest animal to deal with is a curious, somewhat wary polar bear that has never been previously rewarded by food associated with human activity.

Deterrent efforts also benefit from good detection efforts. Early detection of a polar bear's approach or presence permits more preparation time and provides more options for deterrent actions. There is no perfect deterrent, but there are many options and usually a combination of techniques used by a well-trained hazer with an understanding of polar bear behavior works well.

Overuse of deterrents can decrease their effectiveness. Polar bears will get used to most deterrents if repeatedly exposed to them. This is especially true of noises, but is also true of non-lethal projectiles.

7.3 HAZING/DETERRENCE TOOLS AND TECHNIQUES

Hazing and deterring a polar bear activities are completed to prevent the polar bear from some activity or getting it to move away by intimidating or frightening it. In the context of this project, it should be done either visually, with sound, or with a small amount of physical pain. Details about the advantages and limitations of the various deterrents will be covered in training sessions for hazers.


At the Mary River project sites, where attractants are minimized and food and garbage carefully controlled, hazing a polar bear should often be accomplished through the use of a vehicle or piece of heavy equipment as with bangers or screamer shells. If vehicular hazing is ineffective, more intensive deterrent tools can be used.

7.3.1 VISUAL DETERRENCE

One way to intimidate a polar bear is visually with size and movement. Generally, a polar bear perceives large size and movement towards it as assertive/dominant. Moving towards a polar bear with a large piece of equipment is often enough to haze it. Vehicles, heavy equipment, snowmobiles, and helicopters can all be used to haze polar bears.

7.3.2 NOISE DETERRENCE

Noise is another way to intimidate or frighten a polar bear into moving away. Depending on the situation air horns, sirens, screamer or cracker shells and even yelling can haze a polar bear, at least for a short time. Making noise with construction equipment as you haze a polar bear can also be effective but polar bears can quickly get used to, and start to ignore hazing noises.

	Polar Bear Safety Plan	Issue Date: March 7, 2016 Revision: 1	Page 19 of 23
	Environment	Document #: BAF-PH1-830-P16-0041	

7.3.3 PHYSICAL DETERRENCE

Physical pain either from a chemical irritant such as bear pepper spray or from being hit by non-lethal ammunition such as a 12-gauge beanbag or rubber projectile is another good way to dissuade a polar bear from approaching or frequenting facilities. Bear pepper spray is a good close-range deterrent in the right circumstances but the canisters may not work well when cold.

Shooting a polar bear with a non-lethal round works well because polar bears are not used to random physical contact and hitting a polar bear with one of the projectiles can be a good way to get a reaction from the animal, especially from a wary, non-food-conditioned polar bear. However, the effectiveness also may decrease with repeated use and it is difficult to provide enough punishment to dissuade a highly motivated, determined polar bear from food rewards.

7.4 DETERRENTS TO BE KEPT ON-SITE

Firearms, ammunitions and deterrents shall be stored in a locked cabinet at the security offices and their use is limited to authorized personnel only.

At high-risk facilities or locations, firearms, ammunitions and deterrents may be kept readily available in designated locations for emergency use.

7.4.1 12 GAUGE SHOTGUN

A 12 gauge shotgun is used for both deterrence and protection at Project sites and work areas. When carried in the field, the shotgun will be carried semi-loaded with lethal rounds (3" rifled slugs).

7.4.2 RG-46 PISTOLS, CARTRIDGES, SCREAMERS AND BANGERS

Bangers and screamer shells shall be maintained at Project sites and should only be fired away from the camps and fuel storage. Caution is required in dry conditions to avoid starting a tundra fire.

7.4.3 BEAR PEPPER SPRAY


Capsaicin spray may work on polar bears but it has not been thoroughly tested. Employees shall be aware that pepper spray may not work when the container is cold or may be less effective in windy conditions.

7.4.4 LONG RANGE ACOUSTIC DEVICE (LRAD)

Although not currently employed at Project site areas, a LRAD may be used as an acoustic deterrent. Upon assessment of suitability of LRADs at Project sites, it is determined that LRADs are an effective deterrence mechanisms, Baffinland will facilitate their installation.

7.5 POLAR BEAR BEHAVIOR AND DETERRENCE

A hazer who understands polar bear behavior and knows about the type and strength of a polar bear's motivation will be much better at using deterrents successfully (refer to Section 3.1 – Polar Bear Behaviour).

	Polar Bear Safety Plan	Issue Date: March 7, 2016 Revision: 1	Page 20 of 23
	Environment	Document #: BAF-PH1-830-P16-0041	

Polar bears are not territorial. They have personal space and use a pecking order to share resources. The more dominant animals can access areas first and less dominant polar bears work around them. Polar bears will defer to more dominant animals and try to avoid conflicts with larger, stronger polar bears. That tendency can be used in hazing efforts. If a polar bear does not know the status of another animal it bases its reaction on whether or not that animal's behavior is perceived as that of a dominant animal. The behavior of hazers should communicate dominance to polar bears even before they use deterrent rounds.

Polar bears also react differently if they are outside their normal comfort zone. Meeting a polar bear in the middle of its natural habitat creates a different dynamic than if you encounter it when it has entered a relatively unfamiliar human zone.

Polar bear encounters at the Mary River project will often be with animals that are entering or are on the edge of "human habitat", often just out of curiosity of the strange activity or following interesting smells. Those polar bears should be somewhat wary and more tentative in their approaches. Such polar bears should react cautiously and retreat if something large, such as a vehicle or piece of heavy equipment, moves towards them. This is especially true of naïve animals that have not had the chance to get accustomed to equipment noise and activity.

Exception: an extremely hungry, desperate polar bear that will likely require serious efforts to chase off (refer to Appendix C: Protocols for Polar Bear Hazing).

8 BEAR INTERACTION PROCEDURES


When completing activities in the field, personnel are required to work in teams of two or more. This will allow for one person to look for polar bears while the other performs tasks since it is extremely difficult to dedicate sufficient watch for approaching polar bears while completing work tasks at the same time. If exceptions to this rule are made, careful consideration must be given to ensure that worker safety is adequately addressed. In some cases, an armed Polar Bear Monitor will be assigned to accompany work crews.

All off-site work requires extra caution and vigilance to avoid polar bear encounters as there is a greater likelihood of an undetected polar bear away from more developed sites. Off-site workers and Polar Bear Monitors must continuously be on alert to avoid a surprise encounter. Attentiveness is even more critical during darkness, foggy conditions, blowing snow, or any condition that decreases one's ability to detect polar bears. In high-risk areas, a Polar Bear Monitor shall be assigned to watch for polar bears while others are working.

8.1 INTERACTION AVOIDANCE PROCEDURE

The following section provides the procedures all Baffinland Employees, Contractors, and Visitors shall comply with.

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	Polar Bear Safety Plan	Issue Date: March 7, 2016 Revision: 1	Page 21 of 23
	Environment	Document #: BAF-PH1-830-P16-0041	

- Prior to commencing work activities at any location (at Project sites and off-site work areas), workers shall scan the surrounding area for evidence of polar bears. Use vehicle headlights or spotlights to scan the area if it is dark;
- Check with the Polar Bear Monitor or security to ascertain that the area is clear of evidence of a polar bear. Aircraft can be useful for spotting polar bears. Helicopters can circle and check for polar bears before dropping off crews at work sites. However, aircraft on routine flights that spot polar bears will not make low passes for better looks or to take photos. This stresses the animals and is illegal. The surrounding area must be free of polar bear prior to the initiation of work;
- The designated Polar Bear Monitor will maintain watch from the perimeter of the work location(s). Work crews at locations removed from the main work crew will maintain communications with the Polar Bear Monitor. All work crews shall maintain a safe retreat area such as a building, vehicle or predetermined area at each work site;
- Whenever possible, refrain from taking food outdoors to avoid attracting polar bears.
- In the event a polar bear is sighted, retreat to a secure location such as a building, vehicle or predetermined area. Report all polar bear sightings to the designated Polar Bear Monitor and on-site supervisor as soon as it is safe to do so from a secure location. Do not remain in an unsafe situation to view or photograph a polar bear;
- Look outside before leaving any vehicle or building;
- Use good judgment and information acquired from training;
- If near a snow machine or vehicle and a polar bear approaches, start the engine and rev it to make the polar bear aware of your presence. The noise will often cause the polar bear to move away;
- If a polar bear is seen while in an exposed area, do not attempt to yell or run. You cannot out-run a polar bear. Back away slowly towards a safe retreat keeping your eyes on the polar bear. If the polar bear approaches, it can be distracted by dropping something such as an item of clothing. If attacked by a polar bear, fight back with anything at hand, as hard as you can, concentrating on the polar bear's face and nose;
- In the event of a vehicle break down, call for help rather than walking back; and
- Always report a polar bear encounter immediately to the Environmental Superintendent or his/her designate.


8.2 DEFENSIVE KILL PROCEDURE

In the event that a defensive kill of a Polar Bear is required, the following **MUST** occur:

- The Environmental Superintendent or his/her designate must within 2 hours make an initial report of the incident to the GN Wildlife Officer, the affected HTO and the QIA, both by telephone and by email and in that sequence. A follow-up report must then be provided at the earliest possible opportunity and include the time and date that the initial report was made, to whom the incident was reported, the manner in which the parties were informed, they type and sex of the wildlife involved, a detailed account of what occurred as well as when and where, a description of the

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	Polar Bear Safety Plan	Issue Date: March 7, 2016 Revision: 1	Page 22 of 23
	Environment	Document #: BAF-PH1-830-P16-0041	

events leading up to the incident and the steps that followed the incident. The contact information for the applicable stakeholders is as follows:

George Koonoo, Wildlife Officer, (867) 899-1330, pondwildlife@qiniq.com

David Arreak, HTO Manager (Pond Inlet), (867) 899-8856, htopond@qiniq.com

Rebecca Mikki, HTO Manager (Igloodik), (867) 934-8807, igloodikhito@gmail.com


David Qamaniq, Acting QIA Environmental Monitor, (867) 899-8640, dqamaniq@qia.ca

Stephen Bathory, Acting QIA Environmental Monitor, (867) 975-8400, swbathory@qia.ca

- On receiving notice of a wildlife kill, the on-site QIA IIBA Coordinator or the QIA Environmental Monitor may identify an individual who shall be directed to attend the wildlife kill location as soon as possible to prepare the carcass and, where feasible, have the Company deliver salvageable wildlife parts to an affected community. Where immediate transport by the Company to an affected community is not feasible, the QIA IIBA Coordinator or QIA Environmental Monitor may provide direction to the Company for the proper storage of wildlife parts until transportation can be provided.
- In the event that Baffinland does not obtain direction from the QIA representative within 2 hours of the kill, the company must field dress the carcass. Human Resources will maintain and have available a list of Inuit workers at the respective sites that have the experience and expertise to conduct the field dressing and the Environment Department will provide the tools to do so in the form of a Wildlife Carcass Dressing Kit. **The meat and other usable parts cannot be allowed to spoil.**
- As part of the carcass preparation, the following parts must be preserved and delivered to the Conservation Officer: the lower jaw or an undamaged post-canine tooth, any lip tattoos present, any radio collars or ear tags present and evidence of the sex of the animal (i.e. the penis bone/baculum).
- Baffinland must deliver all salvageable parts to the designated community within 24 hours of the kill if possible. In the interim and to avoid spoilage, all salvageable parts including meat must be promptly and safely stored in a refrigerated place and carcasses should not be stored in sea cans.
- In the event that an employee, contractor or sub-contractor causes an accidental or emergency kill of a Polar Bear within the Project Area, the HTO of the affected community may apply for compensation. **In no case shall the total amount to be compensated per polar bear be less than \$20,000.**
- For further information, please refer to the QIA Directive 2013-1-17-2 and the IIBA Article 17 respectively (Appendix B & C).
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	Polar Bear Safety Plan	Issue Date: March 7, 2016 Revision: 1	Page 23 of 23
	Environment	Document #: BAF-PH1-830-P16-0041	

9 POLAR BEAR REPORTING AND RECORD KEEPING


Polar bear sightings shall be recorded on the wildlife log. Project personnel, who sight polar bears or polar bear sign such as tracks, will communicate the details to the Polar Bear Monitor or security personnel. To the extent available, they will record observations such as size, age, sex, reaction, duration of interaction, and closest approach. Data acquired will be made available to the Environment Department. All hazing and deterrent actions must be reported immediately to Baffinland's Environment Superintendent or designate.

10 IMPLEMENTATION/EVALUATION/FEEDBACK

Baffinland shall take all necessary measures to ensure that this Plan is utilized and made available at Project sites and that all employees, contractors and visitors are familiar with its procedures. This Plan shall be reinforced at environmental briefings and other safety forums to ascertain its understanding and use by all Project personnel.

Routine hazard assessments and compliance checks shall be performed. Site visits by Environment Department staff to evaluate operations activities in terms of polar bear issues shall also be conducted. Health and Safety on-site staff shall employ a checklist of plan components to ensure that the plan is being followed.

Baffinland shall complete annual evaluation to this Plan and complete revisions based on the findings of this evaluation as required. Management will solicit from its employees and contractors suggestions to improve the plan and its procedures. Often the people most directly impacted by these plans can come up with improves methods of achieving the goals and objectives provided in this Plan. Lessons learned during the exploration, drilling and construction phases shall also effective in reducing conflicts as the project progresses.


	Polar Bear Safety Plan	Issue Date: March 2, 2016 Revision: 1	
	Environment	Document #: BAF-PH1-830-P16-0041	

APPENDIX A

SUSTAINABLE DEVELOPMENT POLICY

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	Polar Bear Safety Plan	Issue Date: March 2, 2016 Revision: 1	
	Environment	Document #: BAF-PH1-830-P16-0041	

At Baffinland Iron Mines Corporation (Baffinland), we are committed to conducting all aspects of our business in accordance with the principles of sustainable development & corporate responsibility and always with the needs of future generations in mind. Baffinland conducts its business in accordance with the Universal Declaration of Human Rights and ArcelorMittal's Human Rights Policy which applies to all employees and affiliates globally.

Everything we do is underpinned by our responsibility to protect the environment, to operate safely and fiscally responsibly and with utmost respect for the cultural values and legal rights of Inuit. We expect each and every employee, contractor, and visitor to demonstrate courageous leadership in personally committing to this policy through their actions. The Sustainable Development and Human Rights Policy is communicated to the public, all employees and contractors and it will be reviewed and revised as necessary on a regular basis. These four pillars form the foundation of our corporate responsibility strategy:

1. Health and Safety
2. Environment
3. Upholding Human Rights of Stakeholders
4. Transparent Governance

1.0 HEALTH AND SAFETY

- We strive to achieve the safest workplace for our employees and contractors; free from occupational injury and illness, where everyone goes home safe everyday of their working life. Why? Because our people are our greatest asset. Nothing is as important as their health and safety. Our motto is "Safety First, Always".
- We report, manage and learn from injuries, illnesses and high potential incidents to foster a workplace culture focused on safety and the prevention of incidents.
- We foster and maintain a positive culture of shared responsibility based on participation, behaviour, awareness and promoting active courageous leadership. We allow our employees and contractors the right to stop any work if and when they see something that is not safe.

2.0 ENVIRONMENT


- Baffinland employs a balance of the best scientific and traditional Inuit knowledge to safeguard the environment.
- Baffinland applies the principles of pollution prevention, waste reduction and continuous improvement to minimize ecosystem impacts, and facilitate biodiversity conservation.
- We continuously seek to use energy, raw materials and natural resources more efficiently and effectively. We strive to develop more sustainable practices.
- Baffinland ensures that an effective closure strategy is in place at all stages of project development to ensure reclamation objectives are met.

3.0 UPHOLDING HUMAN RIGHTS OF STAKEHOLDERS

- We respect human rights, the dignity of others and the diversity in our workforce. Baffinland honours and respects the unique cultural values and traditions of Inuit.

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	Polar Bear Safety Plan	Issue Date: March 2, 2016 Revision: 1	
	Environment	Document #: BAF-PH1-830-P16-0041	

- Baffinland does not tolerate discrimination against individuals on the basis of race, colour, gender, religion, political opinion, nationality or social origin, or harassment of individuals freely employed.
- Baffinland contributes to the social, cultural and economic development of sustainable communities in the North Baffin Region.
- We honour our commitments by being sensitive to local needs and priorities through engagement with local communities, governments, employees and the public. We work in active partnership to create a shared understanding of relevant social, economic and environmental issues, and take their views into consideration when making decisions.
- We expect our employees and contractors, as well as community members, to bring human rights concerns to our attention through our external grievance mechanism and internal human resources channels. Baffinland is committed to engaging with our communities of interest on our human rights impacts and to reporting on our performance.

4.0 TRANSPARENT GOVERNANCE

- Baffinland will take steps to understand, evaluate and manage risks on a continuing basis, including those that may impact the environment, employees, contractors, local communities, customers and shareholders.
- Baffinland endeavours to ensure that adequate resources are available and that systems are in place to implement risk-based management systems, including defined standards and objectives for continuous improvement.
- We measure and review performance with respect to our safety, health, environmental, socio-economic commitments and set annual targets and objectives.
- Baffinland conducts all activities in compliance with the highest applicable legal & regulatory requirements and internal standards.
- We strive to employ our shareholder's capital effectively and efficiently and demonstrate honesty and integrity by applying the highest standards of ethical conduct.

4.1 FURTHER INFORMATION


Please refer to the following policies and documents for more information on Baffinland's commitment to operating in an environmentally and socially responsible manner:

Health, Safety and Environment Policy
Workplace Conduct Policy
Inuktitut in the Workplace Policy
Site Access Policy
Hunting and Fishing (Harvesting) Policy
Annual Report to Nunavut Impact Review Board
ArcelorMittal Canada Sustainability and Corporate Responsibility Report

If you have questions about Baffinland's commitment to upholding human rights, please direct them to contact@baffinland.com.

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	Polar Bear Safety Plan	Issue Date: March 2, 2016 Revision: 1	
	Environment	Document #: BAF-PH1-830-P16-0041	

Brian Penney
Chief Executive Officer
March 2016

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	Polar Bear Safety Plan	Issue Date: March 2, 2016 Revision: 1	
	Environment	Document #: BAF-PH1-830-P16-0041	

APPENDIX B

QIA DIRECTIVE 2013-1-17-2

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	Polar Bear Safety Plan	Issue Date: March 2, 2016 Revision: 1
	Environment	Document #: BAF-PH1-830-P16-0041



Directive 2013-1-17-2

1.0 Introduction

The following directive is presented to Baffinland Iron Mines Corporation (BIMC) from the Qikiqtani Inuit Association in relation to Article 17.2 of the Inuit Impact and Benefit Agreement. This directive is issued to BIMC on December 9th, 2013 and is considered applicable from the date issued.

2.0 Wildlife Incident Reporting Directive


Wildlife kills must be reported at the very earliest opportunity (ideally within hours of the kill), by telephone, and by email, to QIA's Environmental Monitor and to the HTO of the community or communities affected, both promptly and in parallel with the responsible Governmental Authority.

For the purposes of Article 17.2.3 only, QIA hereby designates Mr. David Qamaniq and Mr. Stephen Williamson Bathory as its Acting Environmental Monitors.

Mr. Qamaniq may be reached by phone at (867) 899-8640 and by email at: dqamaniq@qia.ca

Mr. Shoo may be reached at (867) 975-8400 and by email at: SShoo@qia.ca

QIA may update and/or replace its designates as required and will provide a formal notification amending QIA's designate and his/her contact information.

	Polar Bear Safety Plan	Issue Date: March 2, 2016 Revision: 1
	Environment	Document #: BAF-PH1-830-P16-0041

Wildlife incidents must be reported at the earliest possible opportunity, and should include the following information:

- (i) Date and time the report was made;
- (ii) To whom the incident was reported;
- (iii) The manner in which parties were notified;
- (iv) The type of wildlife involved (including the sex);
- (v) A detailed account of what occurred, where it occurred, and when;
- (vi) A description of the events leading up to the incident;
- (vii) Steps that were followed after the incident.

3.0 Wildlife Kill: Notice and Follow-up Requirements

QIA wishes to underscore the importance and need for timely handling, preparation and skinning of the wildlife carcass.

In the event that the Company does not obtain directions from a QIA representative within 2 hours of a wildlife kill, the Company should be prepared to attend to field dressing, gutting, skinning, cutting the carcass, and storing the parts to ensure that the meat and other useable parts are not allowed to spoil. QIA recommends that the Company's wildlife monitors be trained to carry out these tasks, if so required.


In the case of a polar bear kill, the following parts must be preserved for delivery to the local Conservation Officer:

- (i) the lower jaw or an undamaged post-canine tooth,
- (ii) any lip tattoos present,
- (iii) any radio collars or ear tags present, and
- (iv) evidence of sex (i.e. the penis bone/baculum).

QIA expects that the Company will deliver all salvageable wildlife parts to the designated community within twenty-hour (24) hours of a wildlife kill. In the interim, and to avoid spoilage, all salvageable wildlife parts including meat must be promptly and safely stored in a refrigerated place. Wildlife carcasses should not be stored in sea cans.

QIA further directs that all Company staff with the responsibility to handle polar bears are familiar with the guidance set forth for Problem Bears (see page 5) from the following publication:

Summary of the Nunavut Hunting Regulations 2012-13.
Government of Nunavut, Department of Environment.
<http://env.gov.nu.ca/sites/default/files/2012nuhuntingguide.pdf>

	Polar Bear Safety Plan	Issue Date: March 2, 2016 Revision: 1	
	Environment	Document #: BAF-PH1-830-P16-0041	

APPENDIX C

IIBA ARTICLE 17 – WILDLIFE COMPENSATION

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	Polar Bear Safety Plan	Issue Date: March 2, 2016 Revision: 1
	Environment	Document #: BAF-PH1-830-P16-0041

IIBA ARTICLE SEVENTEEN - WILDLIFE COMPENSATION

17.1 Purpose

The purpose of this Article is:


- a) To create a wildlife incident reporting program for the reporting of wildlife fatalities associated with the Mary River Project;
- b) To establish compensation for emergency or illegal kills of polar bears by Company employees or contractors that an HTO may apply for, unless caused by a “Major Event” (as defined herein), as an additional remedy to an NLCA claim by the HTO for wildlife compensation, in accordance with Section 6.6.2 of the NLCA; and
- c) To establish a wildlife compensation fund that QIA, an HTO, or an Inuk may apply to, except where related to a “Major Event” (as defined herein), as an additional remedy to an NLCA claim for wildlife compensation, in accordance with Section 6.6.2 of the NLCA.

17.2 Wildlife Incident Reporting

- 17.2.1 The Company will report all wildlife kills or accidents involving wildlife in the Project Area by employees of the Company or contractors.
- 17.2.2 All incidents shall be reported to QIA and the communities in parallel with reporting to the responsible Governmental Authority or within five working days of the incident.
- 17.2.3 On receiving notice of a wildlife kill, the QIA IIBA Coordinator or the QIA Environmental Monitor may identify an individual who shall be directed to attend the wildlife kill location as soon as possible to prepare the carcass and, where feasible, have the Company deliver salvageable wildlife parts to an affected community. QIA agrees that where immediate transport by the Company to an affected community is not feasible, the QIA IIBA Coordinator or QIA Environmental Monitor may provide direction to the Company for the proper storage of wildlife parts until transportation can be provided. The Company shall pay for any costs associated with the preparation, storage and transport of accidental or emergency wildlife kills.

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	Polar Bear Safety Plan	Issue Date: March 2, 2016 Revision: 1	
	Environment	Document #: BAF-PH1-830-P16-0041	

17.3 No Abrogation of NLCA Rights

17.3.1 The Parties agree that nothing contained in this Agreement shall in any way abrogate, diminish or otherwise limit the rights of QIA, an HTO or an Inuk to file

a claim for compensation with the Surface Rights Tribunal pursuant to Article 6 of the NLCA.

17.3.2 Notwithstanding Section 17.3.1, where an HTO, an Inuk or Inuit receives compensation pursuant to Sections 17.5 or 17.6, the compensation to which such claimant would otherwise be entitled pursuant to Article 6 of the NLCA shall be reduced by the amount of any compensation received pursuant to Sections 17.5 or 17.6, as the case may be. For greater certainty, the rights available pursuant to Article 17 shall be in addition to rights available pursuant to Article 6 of the NLCA, but shall not thereby entitle the claimant to double compensation in respect of the same damages.

17.4 IIBA Wildlife Compensation – Not For “Major Events”


17.4.1 The Parties agree that the additional remedies established for wildlife compensation pursuant to Section 17.5 and 17.6 shall not be available for claims arising from a “Major Event” (as defined herein). Any claim for loss or damage in relation to wildlife harvesting that arises from a Major Event related to the Project shall be made pursuant to Article 6 of the NLCA or otherwise in accordance with any other rights or remedies that the claimant may have under laws of general application.

17.4.2 For the purposes of Article 17, the following types of incident or activity shall constitute a “Major Event”:

- a) Any incident or activity that is identified as a significant adverse impact and which meets the defined criteria for such an impact, as set forth in the Final EIS;
- b) The introduction of invasive species directly or indirectly arising from Project activities that cause a significant adverse impact;
- c) A significant adverse impact to existing commercial fisheries;

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	Polar Bear Safety Plan	Issue Date: March 2, 2016 Revision: 1
	Environment	Document #: BAF-PH1-830-P16-0041

d) The long term or catastrophic decline of wildlife populations that can be attributed, directly or indirectly, to the Project; and

e) Any other incident or activity determined by the Executive Committee to be a “Major Event” based on information from the public, QIA or the Company.

For greater certainty, in relation to a claim for IIBA wildlife compensation, any question as to whether an incident or activity is of such significance as to constitute a Major Event for the purposes of Article 17 shall be determined by the Executive Committee.

17.5 Compensation for Polar Bear Kills

17.5.1 In the event that an employee of the Company, a contractor or a subcontractor causes an accidental or emergency kill of a polar bear within the Project Area, the HTO of the affected community may apply for compensation to be paid by the Company in an amount to be determined by QIA. The amount shall cover the value of the tag, as determined by QIA following discussion with the affected HTO, allocated for the bear killed plus, if applicable, an amount to compensate for the forfeiture of a tag in the following year for the affected community. In no case shall the total amount compensated per polar bear be less than \$20,000. The minimum amount of compensation for polar bear kills may be reviewed and renegotiated periodically by the Parties.

17.5.2 If it is uncertain which HTO is the affected HTO, then QIA will determine which HTO is the affected HTO to receive compensation and shall advise the Company accordingly.


17.5.3 Compensation otherwise available to an HTO pursuant to Section 17.5.1 does not apply if a polar bear kill arises in the context of an incident or activity that constitutes a Major Event, or is deemed to constitute a Major Event by the Executive Committee.

17.6 Wildlife Compensation Through the Wildlife Compensation Fund

17.6.1 The Company shall pay an initial contribution of \$750,000 to QIA to manage the contribution approved by the Company, to establish a Wildlife Compensation Fund pursuant to this Agreement.

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	Polar Bear Safety Plan	Issue Date: March 2, 2016 Revision: 1	
	Environment	Document #: BAF-PH1-830-P16-0041	

17.6.2 An Inuk or Inuit may apply to the Wildlife Compensation Fund for compensation for loss or damage relating to wildlife suffered by such claimant or claimants as a result, directly or indirectly, of development activity related to the Project.

17.6.3 If the Wildlife Compensation Fund is depleted to less than \$50,000, the Company will decide either to make further monetary contributions to the Wildlife Compensation Fund or terminate the Wildlife Compensation fund. If the Company decides not to provide additional funding, it will provide written reasons to QIA for its decision.


17.6.4 QIA will create, manage and administer the Wildlife Compensation Fund. All contributions of the Company to the Wildlife Compensation Fund shall be segregated from all other accounts and funds of QIA and used solely for the purposes of the Fund. For the first three Years of this Agreement, the Company shall pay for the administration costs which shall be addressed in the annual Implementation Budget.

17.6.5 In consultation with the Company, QIA will develop a protocol, including a

claims procedure and substantive criteria, for compensation claims to the Wildlife Compensation Fund. All substantive criteria for compensation claims to the Wildlife Compensation Fund shall be consistent with the principles of Article 6 of the NLCA. The Wildlife Compensation Fund protocol may be amended by QIA, after consultation with the Executive Committee from time to time. A copy of the protocol and any amendment thereto shall be promptly provided to the Company.

17.6.6 QIA shall provide the Executive Committee with an annual report detailing, for the Year reported, the total number of claims, the identity of all claimants and their community of residence, a summary of the details of all claims made, the decision made in each claim, including any compensation paid and the reasons for decision for each claim.

17.6.7 The Company and QIA may at any time mutually agree to terminate the Wildlife Compensation Fund on such terms and conditions as they may mutually agree.


	Polar Bear Safety Plan	Issue Date: March 2, 2016 Revision: 1	
	Environment	Document #: BAF-PH1-830-P16-0041	

APPENDIX D

POLAR BEAR HAZING PROTOCOL

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	Polar Bear Safety Plan	Issue Date: March 2, 2016 Revision: 1	
	Environment	Document #: BAF-PH1-830-P16-0041	

POLAR BEAR HAZING PROTOCOL


1. Polar bear hazers must use good judgment about the situations where a polar bear can be hazed since it is not possible to provide rules to cover every situation. However, careful documentation and accountability for all deterrent rounds used will also be required.
2. Hazers must have a clear idea of what they are trying to accomplish, and make sure that it is appropriate and authorized by Baffinland Iron Mines Corporation.
3. If a polar bear is observed moving towards any Mary River Project sites or a work crew, hazers will prepare to deter but will first monitor it and give it an opportunity to pass by without any deterrence. When practical a second person with a firearm and lethal rounds should be used as backup.
4. An exhausted polar bear that swims to shore and rests will not be hazed, but given time to rest and recuperate, while being monitored.
5. If instead of passing through, a polar bear approaches the facilities or work sites, the polar bear's actions will be discouraged.
6. Start out with as low intensity as possible, and raise the level of response only to the degree that the polar bear is being stubborn.
7. Try using vehicles to move a polar bear before resorting to weapons. It may be relatively easy to move a polar bear with a vehicle or a piece of heavy equipment.
8. If the polar bear is sighted before it enters a work area, employ any number of hazing options. Position a vehicle or piece of heavy equipment in its line of travel to cut it off. Use vehicle movement, horn, RG-46 launchers and possibly deterrent rounds as a last resort to turn it away.
9. If the polar bear is adjacent to a work area, make sure everyone is in a safe spot before hazing. For most scenarios it is better to wait until people have retreated to safety before hazing. A polar bear must not be hazed if there is a chance it might run into workers as it flees.
10. Make sure the polar bear has a clear route to go where you want it to go, and it is best to haze it towards an area it will want to go (e.g. towards the coast or the direction where it came from).

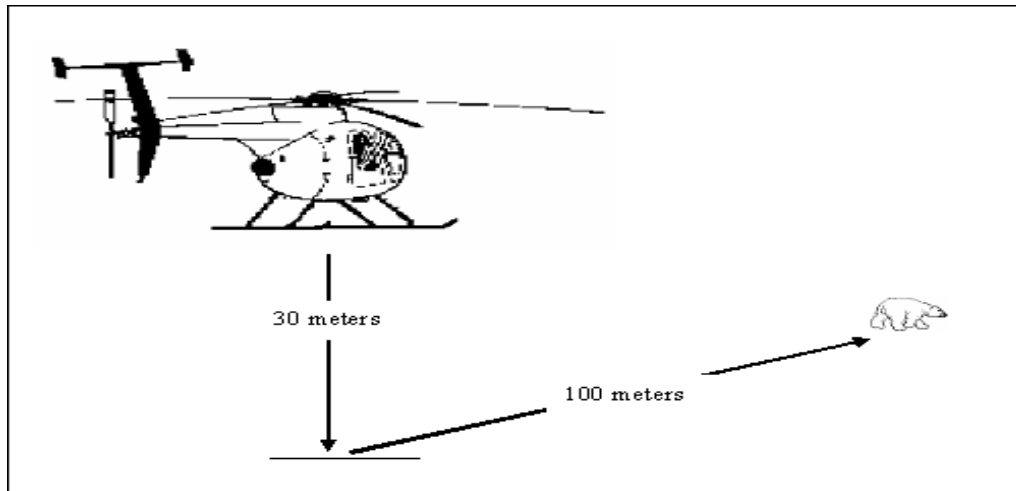
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	Polar Bear Safety Plan	Issue Date: March 2, 2016 Revision: 1	
	Environment	Document #: BAF-PH1-830-P16-0041	

11. Make it as easy as possible for the polar bear to flee in the desired direction, and try to first use finesse rather than large amounts of force and firepower.
12. The exception to the subtle approach is if, in spite of best efforts, a polar bear gets into food or garbage, the reaction should then be immediate: utilize equipment or bean bag shots. An immediate hazing response lessens the chance of a polar bear hanging out or returning.
13. The use of helicopters to haze polar bears is approved under the following conditions:
 - Stress the polar bear as little as possible
 - Keep the helicopter well back from the polar bear. The minimum distance between the helicopter and the polar bear is 100 meters back and 30 meters up.
 - Move the polar bear in a direction away from people and facilities.
 - Push the polar bear at a steady walk. A running polar bear, especially large polar bears, can rapidly overheat.
 - Don't haze a polar bear with a helicopter when ambient temperature is over 70°F (20°C).
 - Don't aggressively push a polar bear. Polar bears may hunker down and not move if pushed or chased too aggressively. A slow approach is usually all it takes, especially if hovering near the ground creates a snow cloud due to the prop wash.
 - **As a rule of thumb**, do not push a polar bear for more than ten minutes or 3 km (2.2 miles) from the point of initiation or occupied facilities. This will depend on the situation – location of facilities, polar bear behaviour, weather, and geographic features. The key element is to keep the polar bear moving on its own.
 - Monitor the polar bear, if possible, to make sure it does not return. Helicopter pilots will review the Polar Bear Hazing Protocol prior to actively participating in hazing.


	Polar Bear Safety Plan	Issue Date: March 2, 2016 Revision: 1	
	Environment	Document #: BAF-PH1-830-P16-0041	



14. Whenever polar bears are hazed, immediate reporting to the Environment Department is necessary.
15. If deterrent attempts fail, or a polar bear remains in the vicinity of the project location for a prolonged period, the Environment superintendent or designate must be contacted for advice on deterring the polar bear from the work area.
16. Every situation is a bit different and recruiting and training effective polar bear hazers is crucial. Polar Bear Monitors who can make good judgment calls about how much leeway to give a polar bear before initiating deterrence, who understand polar bear behaviour and motivation, and who can get results with minimum force are most successful.
17. If during hazing the polar bear either charges, or if it's rate of advance despite the hazing is such as to pose an immediate threat to any member of the work group (or any other human being), the armed personnel are to fire on the polar bear, aiming preferably between the shoulders to contact the vital organs. Avoid headshots as the polar bear's skull can deflect the bullet. Once the polar bear is hit, keep firing until the polar bear is still. Kill the polar bear cleanly and quickly. A wounded polar bear is very dangerous.
18. To ensure the polar bear is dead approach the down polar bear from the back. Observe that the eyes are opened. If they are not place a lethal shot at the base of the bear's skull.
19. Once you are certain the polar bear is dead immediately contact the Environment Superintendent or designate. In turn they will notify the nearest conservation officer to determine the disposition of the polar bear carcass.

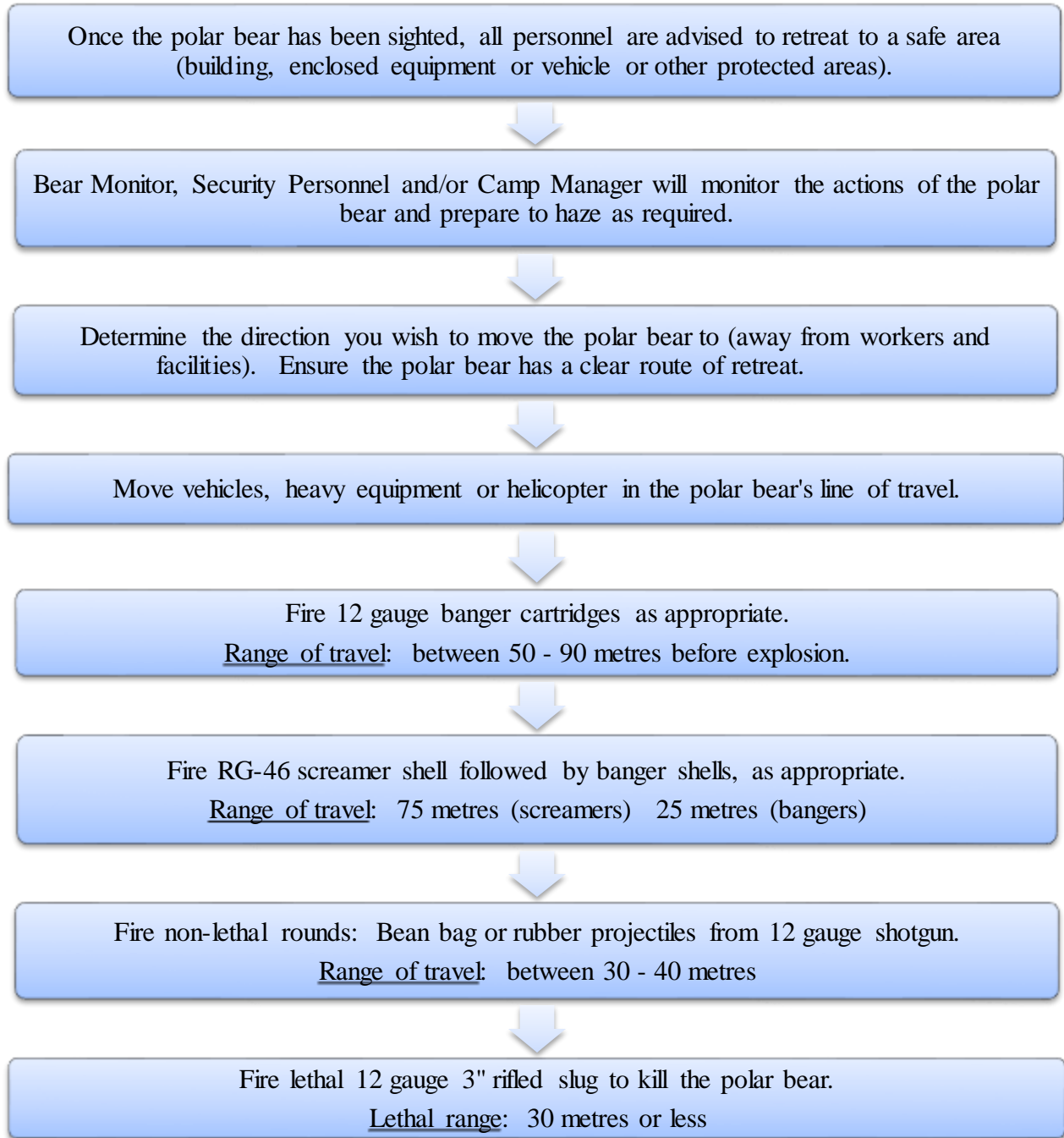
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	Polar Bear Safety Plan	Issue Date: March 2, 2016 Revision: 1	
	Environment	Document #: BAF-PH1-830-P16-0041	


DETERRENCE ESCALATION PROTOCOL

POLAR BEAR APPROACHING FACILITIES OR WORKSITE



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	Polar Bear Safety Plan	Issue Date: March 2, 2016 Revision: 1	
	Environment	Document #: BAF-PH1-830-P16-0041	


NOTE: If during hazing, the polar bear charges or its rate of advance poses an immediate threat to human life, SHOOT TO KILL.

DETERRENCE ESCALATION PROTOCOL

REMOTE FIELD WORK

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	Polar Bear Safety Plan	Issue Date: March 2, 2016 Revision: 1	
	Environment	Document #: BAF-PH1-830-P16-0041	

Once the polar bear has been sighted, all personnel are advised to assemble and retreat to the predetermined safe location.



Bear Monitor, Supervisor or Crew Leader will monitor the actions of the polar bear and prepare to haze as required.



Determine the direction you wish to move the polar bear to (away from the work group).
Ensure the polar bear has a clear route of retreat.



Start and rev-up snowmobiles, gas powered circular saws or other such equipment.




Fire RG-46 screamer shells followed by banger shells, as appropriate.
Range of travel: 75 metres (screamers) 25 metres (bangers)



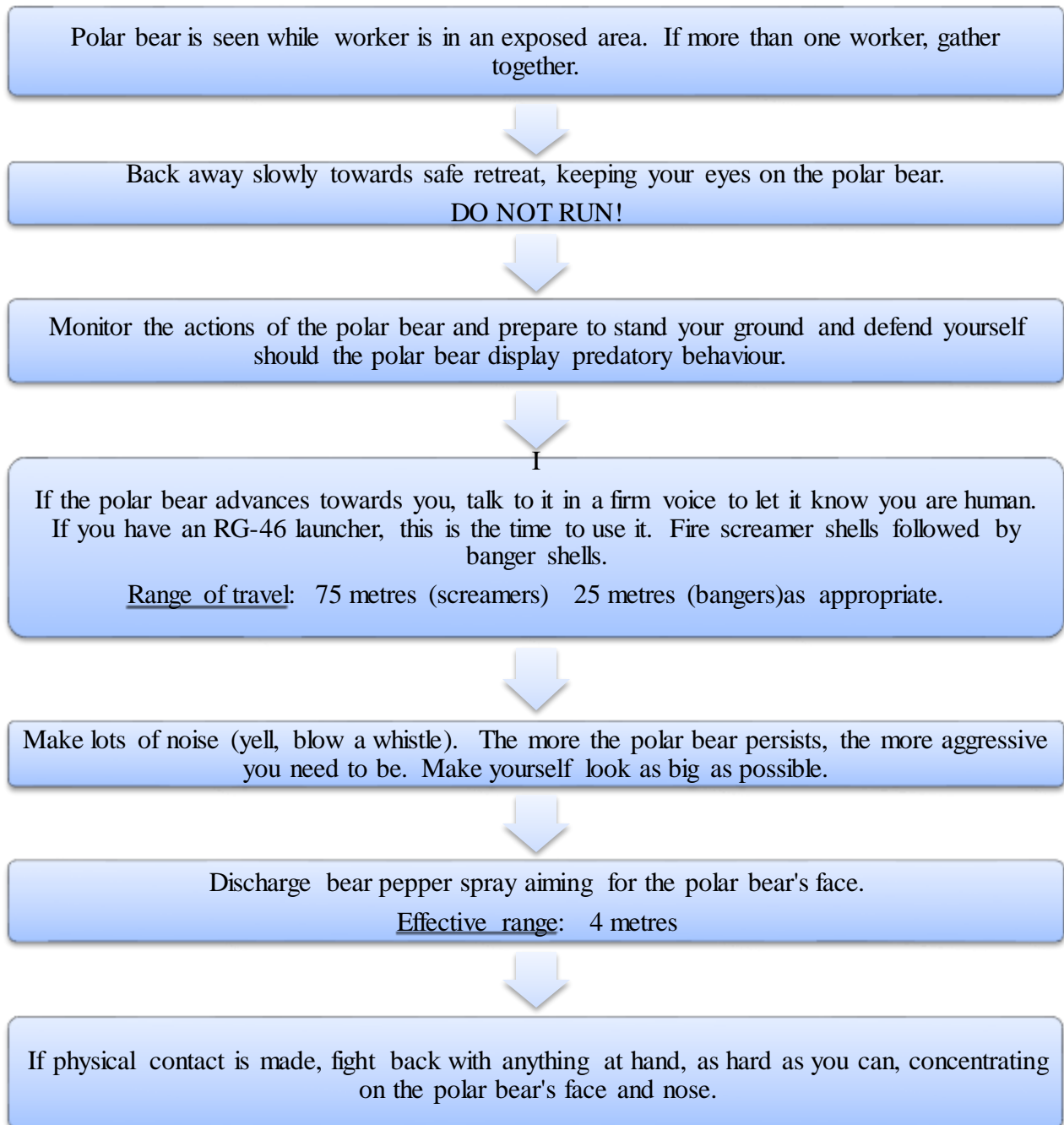
Fire lethal 12 gauge 3" rifled slug to kill the polar bear.
Lethal range: 30 metres or less

NOTE: If during hazing the polar bear charges or its rate of advance poses an immediate threat to human life, SHOOT TO KILL.

	Polar Bear Safety Plan	Issue Date: March 2, 2016 Revision: 1	
	Environment	Document #: BAF-PH1-830-P16-0041	

DETERRENCE ESCALATION PROTOCOL

EXPOSED WORKERS



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