



October 9, 2020

Karen Costello
Nunavut Impact Review Board
P.O. Box 1360
Cambridge Bay, NU
X0B 0C0

Re: Baffinland Response to Comments Received by NIRB from Pond Inlet Residents Regarding NIRB's Ongoing Assessment of the "Phase 2 Development" Project Proposal

Dear Ms. Costello,

Attached are Baffinland's responses to comments received by the Nunavut Impact Review Board (NIRB) from Pond Inlet residents regarding NIRB's ongoing assessment of the Phase 2 Development Project Proposal. Baffinland would like to extend its appreciation to the Mittimatalik Hunters and Trappers Organization (MHTO), and in particular the efforts of Amanda Hanson-Main for assembling these comments. Baffinland has considered each submission carefully and provided direct and meaningful responses. Given the short timeline we had to respond to these comments, only the English version is provided now, while a fully translated Inuktitut version will follow. We trust that in addition to the NIRB making these responses available on the public registry, the MHTO will ensure these responses are received by the comment authors.

Regards,

A handwritten signature in black ink that reads "Megan Lord-Hoyle".

Megan Lord-Hoyle
Vice President, Sustainable Development

Cc: Tara Arko, NIRB
Solomon Amuno, NIRB
Cory Barker, NIRB
Eric Ootoovak, MHTO
Amanda Hanson-Main, MHTO Technical Consultant
Lou Kamermans, BIM
Jared Ottenhof, QIA

| Contributor | Comment | Baffinland Responses |
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| Comments from Jena Merkosak, Pond Inlet Resident | <p>Are they taking into consideration researching and monitoring microorganisms for example algae? Increase in iron dust can disrupt the microorganisms thereby affecting the rest of the food chain. Healthy ecosystems start from the health of microorganisms. Is the Iron Mine ready to do an environmental cleanup which could disrupt the ecosystem? Are they aware that the increase in iron dust emissions creates room for growth for opportunistic microorganisms which are harmful for the animals that we harvest.</p> | <p>Baffinland monitors for microorganisms. We monitor at a variety of trophic levels through the food chain which includes the base –soil, sediment, microorganisms, water, vegetation and fish. This allows us to identify if the project is affecting the environment at any level of the ecosystem that could affect food being consumed by animals or humans.</p> <p>For added context:</p> <ul style="list-style-type: none"> • Metals are naturally occurring in the environment and are present within existing soils and vegetation in the region. As noted, mining activities will result in release of ore dust in the vicinities of the Potential Development Areas (PDAs) at the Mine Site, Milne Port, as well as along the Northern Transportation Corridor; • There is a high degree of certainty on the geochemistry of dust from the project, since multiple years of dustfall chemistry data are available. The metals chemistry of the dust is predominantly composed of iron, aluminum and manganese, since this is an iron ore mine. In general, metals that are reported to bio accumulate in food chains are present at low or very low (below detection limits) concentrations in dustfall near the Project. Therefore, the potential for bioaccumulation in food chains is considered low. • Based on the assessment conducted, it is considered unlikely that ore dust deposition from the Project at the rates considered in this assessment would result in levels of metals in blueberries or caribou tissues that would be harmful to human health, if consumed. Similarly, it is considered unlikely that ore dust deposition from the Project would result in levels of metals in lichen that would be harmful to caribou health. This conclusion is based on consideration of the areas expected to be affected by dustfall, the predicted future soil and vegetation concentrations, and the home range of caribou. • Health Canada has agreed with our assessment methods and our conclusions. There are detailed monitoring programs in place to measure dust on the land, in air, and in marine and freshwater environments. The results of these monitoring programs are reviewed carefully, and adaptive management programs are in place to reduce impacts on the environment. The adaptive management programs have been made stronger in the Phase 2 proposal, particularly related to air quality and dustfall. Dustfall thresholds have been set to protect lichen (caribou forage) and human health. • Based on our current monitoring data here is no evidence of food chain contamination - based on sampling of soil, sediment, water, vegetation, clams and fish tissues. This will continue to be monitored and if we saw a trend over two years, that would trigger adaptive management <p>With regards to Baffinlands willingness to carry out an environmental clean-up and the potential for that clean up to disrupt the ecosystem, Baffinland can confirm it conducts clean ups and housekeeping as part of day to day activities at the operation that all staff participate in to help protect the environment. But in the event of an accident or unanticipated impacts occur we are prepared to take action. We have emergency and spill response plans ready and teams who are trained in environmental clean-up at site. However, should there be unanticipated impacts in the ecosystem we will apply an adaptive management approach. This approach has been strengthened by new commitments to the Qikiqtani Inuit Association that will require Inuit input and approval on the thresholds and triggers that will require action and the pre-determined actions that will be taken if such events occur. This</p> |

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| | | plan will require approval before Phase 2 is fully operational if approved to ensure that expectations around future environmental management measures are well understood and we are prepared to respond. |
| David Qammaniq, MLA for Pond Inlet | MHTO suggested alternative route removed it is by BIM saying too expensive. This should not be an excuse. | <p>Baffinland has looked at three alternative alignments provided in part or entirely by the MHTO. The first two were alternative deviations around the km67 hill, known as Route 2 and Route 3. Route 3 was found to meet all of Baffinlands alternative selection criteria - including technical and economic feasibility, minimum environmental impact and community preference - and was selected as a result. We would like to emphasize that the alternative Route 2 was not rejected based on costs alone. There were overriding safety concerns related to the high embankments and steep cuts that would be required to make this route feasible from an engineering perspective. This is not preferable for environment and technical reasons.</p> <p>Baffinland also investigated a general deviation from the proposed alignment that followed a valley to the north east of the Milne Inlet Tote Road and proposed route for the North Railway. This was a similar alignment to what was investigated through the Phase 2 Alternatives Assessment (TSD-01) and yielded the same outcome. While cost was a consideration in the determination to reject this alternative, there were also significant technical, environmental and cultural concerns. The technical concern is that little is known from a geotechnical perspective in the valley to the north-east as opposed to the proposed route where Baffinland has previously upgraded and maintained the Milne Inlet Tote Road. The environmental and cultural concerns are tied together in the potential impacts of disturbing an additional valley in the North Baffin and increasing the projects zone of influence, including the mitigation of additional yet to be identified cultural sites. The Milne Inlet Tote Road will still be used to transport freight, fuel and personnel for the life of the Project and it is preferable on many levels to maintain as tight a transportation corridor as possible.</p> |
| David Qammaniq, MLA for Pond Inlet | Harvesters Regional Enabling Fund. \$750.00/year the way it is written right now. Inuit do not get compensation for wildlife, they only get compensation for using purchase receipts. | We understand that this comment is in fact referring to the Wildlife Compensation Fund under Article 17 of the IIBA. We have heard concerns with access to this fund in the past. To clarify, the QIA has committed to improving accessibility to this fund which will include hiring a coordinator to improve the delivery of wildlife compensation. This fund will remain in place and will be topped up to maintain a balance of \$750,000 as it is drawn upon. In addition, Baffinland has committed to fund a Regional Harvesters Enabling Program which will receive \$750,000 annually to be used at the discretion of the Hunters and Trappers Organizations in impacted communities. QIA will work with the impacted communities on how to allocate these funds. The Harvesting Enabling Fund which provides \$400,000 of gas annually to Inuit over the age of 12 in Pond Inlet will also remain in place and be renamed the Pond Inlet Harvesters Enabling Fund. Once Steensby is built this will be extended to Igloolik, Sanirajak, Kimmirut and Kinngait. |
| David Qammaniq, MLA for Pond Inlet | 5 to 8 train round trips, max 10 round trips. What would trigger maximum? | With the 3 train system Baffinland is currently proposing, an average of 6 train trips (12 one way transits) are expected each day based on current modelling. If in the future it becomes necessary to add additional train sets to achieve 12 Mtpa, the trains would be shorter and capable of completing more round trips per day. This modification could be required if unexpected operating challenges are experienced that were not considered within the assumptions of the model. This flexibility could also be required to allow for some of the mitigations we proposed when the caribou population rebounds and it becomes necessary to modify our regular operating schedule to account for activity suspensions or reduced speed zones. |

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| David Qammaniq, MLA for Pond Inlet | Stockpile at Milne Port should be enclosed like they did at Nanisivik Mine. | Baffinland will be employing a solution to reduce fugitive dust from the Milne Port stockpiles. A product of paper cellulose will be sprayed onto the stockpiles at the port site, which will form a crust on the outside of the stockpile. This spray will prevent liftoff/dust emissions from the stockpile itself. Baffinland will monitor fugitive dust emissions at the port site and will listen to community members about their visual observations of dust impacts at the port through winter 2020/2021. Should the spray not be as effective as anticipated Baffinland will implement additional mitigations, which are currently under review. |
| David Qammaniq, MLA for Pond Inlet | Investigation of programming at site to tackle substance abuse issue. All employees should be checked through urine samples just like they do during Olympic games, if BIM is serious about this. | <p>Baffinland takes the issue of substance abuse seriously. We offer many levels of support to our employees including in community counselling services, the presence of cultural advisors on site, drug and alcohol education and awareness campaigns on site, and access to a 24/7 Employee and Family Assistance program to help employees through difficult situations. This is an important issue that requires the effort of Baffinland, employees and various levels of government to ensure employees receive the support they need.</p> <p>Baffinland is subject to the various legal restrictions imposed by courts on an employer's ability to conduct random testing. However, consistent with its legal rights, Baffinland does conduct drug and alcohol tests where there is reasonable cause to believe an employee is impaired.</p> |
| David Qammaniq, MLA for Pond Inlet | BIM (Arcelor Mittal) is so rich they have mines in Brazil, Bosnia, Canada, Kazakhstan, Liberia, Mexico, Ukraine and USA | Regardless of the number of businesses Arcelor Mittal is invested in, each one is responsible for their own profit and loss and as such will attract or shrink investment opportunities. Although Arcelor Mittal may have business elsewhere it is currently a minority investor in Baffinland and reported a loss of \$72 million on this investment in its 2019 filing to the Securities and Exchange Commission. |
| David Qammaniq, MLA for Pond Inlet | Ragged island anchorage needs to be removed as it too close to Inuit cabins near Saviit. That is where Inuit normally hunt seal. | Baffinland has not found a feasible alternative to the Ragged Island anchorages, despite investigating a number of potential sites. These investigations have included locations proposed by the MHTO. A safe anchorage must have waters shallow enough for anchors to reach the seabed, and at surface maintain physical features (islands) that can protect vessels from drift ice that is present throughout the shipping season. Baffinland will continue to investigate alternative sites as they are proposed, but cannot suspend its use of the Ragged Island anchorage now or under Phase 2 without a feasible alternative. In the interim, we have adjusted the shipping route and explicitly asked vessel captains to stay further away from the western shoreline of Northern Milne Inlet where many cabins are located and there is increased hunting activity. |
| David Qammaniq, MLA for Pond Inlet | Direct Community Benefits: Funds will go directly to Pond Inlet until such a time Steensby Inlet is operational. | <p>In addition to the substantial benefits that will flow to Inuit and communities through royalties and other payments received by representative Inuit organizations like NTI and QIA, Baffinland has provided direct financial benefits to Pond Inlet and these will continue and increase should Phase 2 be approved. Further, these benefits will not change should Steensby be constructed.</p> <p>Pond Inlet Direct Benefits to date include:</p> <ul style="list-style-type: none"> • \$10,000,000 – Baffinland Inuit Training Centre (Article 8.7) • \$400,000/year – Harvesters Enabling Program (Article 17.7) • \$200,000/year – Wildlife Monitoring Program (Article 17.8) |

| | | <ul style="list-style-type: none">• Tasiuqtiit Working Group: \$370,000 as of end of 2019 shipping season (2018 - \$130,000; 2019 - \$240,000); 2020 - \$140,000 [expected total of 14 vessels over 4.2 Mpta]; Expected \$1,180,000 per year – if Phase 2 is approved• \$50,000/year – Tasiuqtiit Working Group Coordinator• \$25,000/year - Increase the MHTO Manager Salary• \$60,000/year - Create a new position – MHTO Finance Administrator• \$10,000 - Provide a one-time training fund to support the onboarding of the MHTO Finance Administrator• \$561,474 – Donated to Pond Inlet to-date from Sponsorship/Donations Program• \$110,000 for Pond Inlet High School and Elementary School Lunch Program (Article 7.21) <p>Other benefit programs that are available to all 5 North Baffin community include:</p> <ul style="list-style-type: none">• Community Research Vessel (Article 17.9)• \$750,000 – Wildlife Compensation Fund (Article 17.6)• \$275,000 – Business Capacity Start-up Fund (Article 6.3)• \$550,000 – Wellness Fund (Article 12.2)• Community Counsellor in each community through the Ilisaqsivik Society (Article 11.7) <p>Wages paid to employees within communities are also a direct community benefit. In 2019 Baffinland and its contractors employed 60 individuals from Pond Inlet and paid \$2.7 million in employee wages. As of June 30, 2020 Baffinland paid \$654, 584 in wages to Pond Inlet employees, and between March 31, 2020 and September 30, 2020 a further \$913, 260 was paid in standby wages to Pond Inlet employees. In addition to this, Baffinland also employs 4 shipping monitors in Pond Inlet each shipping season.</p> <p>Contracting with community firms is another form of direct community benefits. A table summarizing the value of contracts with Pond Inlet firms by year is provided here:</p> <table><tr><th>Year</th><th>Invoiced</th><th>Inuit Firms</th></tr><tr><td>2019</td><td>\$566,982.00</td><td>Inuarak Outfitting, Nunavut Outfitters, Tagak, Siku Taxi, Niqitaq Fisheries, Tununiq Sauniq Co-op</td></tr><tr><td>2020</td><td>\$173,808.00</td><td>Iglugili, Inuarak Outfitting, Siku Taxi, Niqitaq Fisheries, Tununiq Sauniq Co-op</td></tr></table> | Year | Invoiced | Inuit Firms | 2019 | \$566,982.00 | Inuarak Outfitting, Nunavut Outfitters, Tagak, Siku Taxi, Niqitaq Fisheries, Tununiq Sauniq Co-op | 2020 | \$173,808.00 | Iglugili, Inuarak Outfitting, Siku Taxi, Niqitaq Fisheries, Tununiq Sauniq Co-op |
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| Translated from Inuktitut - no | During the last meeting held by NIRB, Baffinland had said that it wants to | The NIRB is assessing a 12 Mtpa operation as part of the Phase 2 Proposal. Should Baffinland choose to move forward with a modification to the Project in the future, an additional application would be submitted to the NIRB and be subject to approval and | | | | | | | | | |

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| name was listed associated with the question | be able to ship out 12 Metric Tons but the Investors had said that they want to be able to ship out 18 Metric Tons. Does this break any Federal Laws pertaining to mining? | public review. Baffinland will continue to analyze efficiencies to the operation and there are no laws which prevent this from occurring. |
| Hellin Alariaq | From social media, I have seen photos of animals, seal, fish, affected by the mine. How is all of that being monitored? | <p>Baffinland implements an extensive environmental monitoring program that aims to understand how the Project is affecting wildlife and the environment. The results of these monitoring programs are analyzed and presented for public review. Where it appears the Project is affecting wildlife or the environment in a way that wasn't anticipated, then the company is responsible for implementing additional management measures and monitoring their effectiveness. This is called adaptive management, and under Phase 2 this process will be modified based on input from interveners in the review process as well as agreements with the Qikiqtani Inuit Association.</p> <p>Through our current monitoring programs, including sampling of soil, sediment, water, vegetation, clams and fish tissues there is no evidence of food chain contamination. Our marine mammal programs are showing us that there is no measured change in the presence of narwhal in the Regional Study Area, the number of narwhal has remained within previous years' data despite an increase in shipping activity each year. This will continue to be monitored by Baffinland, and under Phase 2 would be complimented by Inuit led monitoring under the Inuit Stewardship Plan. Should either monitoring program indicate a change is occurring that wasn't anticipated, an adaptive management response will be implemented and monitored to ensure it is effective in reducing the potential impact. All of our monitoring programs will continue to run under a Phase 2 expansion where there are more ships and you can access all of our monitoring reports publically on the Baffinland website - https://www.baffinland.com/media-centre/document-portal/. The executive summary of our monitoring reports are provided in English and Inuktitut.</p> |
| Hellin Alariaq | With more ships in Phase 2, how are they going to monitor the affects when there is little to poor monitoring? | Please see above |
| Hellin Alariaq | What about the river that's not safe to drink anymore? | Monitoring results have shown that the risks associated with drinking water directly from waterbodies near the Project's Mine Site are similar to the risks that existed before the Project began. |
| Silas Ootook | I was out caribou hunting to Nulujaa with nephews - as I was short on as to get back home, I used Baffinland gas. My machine engine broke down on my way home. I had filed a complaint to get my check that I can | Through the Mary River IIBA, Baffinland funds the Wildlife Compensation Fund which is administered by the Qikiqtani Inuit Association. Through this fund, an Inuk or Inuit may apply for compensation for loss or damage as a result, directly or indirectly, of development activity related to the Project. As such, it is most appropriate that you speak to the Qikiqtani Inuit Association to discuss this Fund and the application process related to submitting a claim for this incident |

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| | buy machine and yet I never got answers even the secretary won't give me answers. I want a check that I can buy machine. | |
| Daniel Quassa | I was down Bruce Head middle August for my annual narwhal hunting there was aerial survey happening through air. There were also 2 boats coming in from Milne Inlet. I asked MHTO if they were informed about this survey. They didn't know about it. | Baffinland communicates with Pond Inlet about its monitoring programs through a number of forums including Facebook, radio, posters as well as pre and post season shipping meetings. On July 8 and 15 Baffinland held pre-season shipping meetings with the MHTO that outlined all the monitoring programs that would be run this year. Our 2020 monitoring program was also discussed publically at the annual Marine Workshop held by the NIRB on August 25. In addition, we ask for a support letter from the MHTO for monitoring programs before we run them. During the meetings that we have with MHTO, they often provide advice or changes to the program that they would like to see in order to provide support. |
| Melissa Leag Ootoovah | What benefits would by community Pond Inlet get? I am saying no to Phase 2 if my comment counts. I want my only brother and son to know something about hunting narwhals and harvesting fish plus all of the other animals we have here. | <p>In addition to the substantial benefits that will flow to Inuit and communities through royalties and other payments received by representative Inuit organizations like NTI and QIA, Baffinland has provided direct financial benefits to Pond Inlet and these will continue and increase should Phase 2 be approved. Further, these benefits will not change should Steensby be constructed.</p> <p>Pond Inlet Direct Benefits to date include:</p> <ul style="list-style-type: none"> • \$10,000,000 – Baffinland Inuit Training Centre (Article 8.7) • \$400,000/year – Harvesters Enabling Program (Article 17.7) • \$200,000/year – Wildlife Monitoring Program (Article 17.8) • Tasiuqtiit Working Group: \$370,000 as of end of 2019 shipping season (2018 - \$130,000; 2019 - \$240,000); 2020 - \$140,000 [expected total of 14 vessels over 4.2 Mpta]; Expected \$1,180,000 per year – if Phase 2 is approved • \$50,000/year – Tasiuqtiit Working Group Coordinator • \$25,000/year - Increase the MHTO Manager Salary • \$60,000/year - Create a new position – MHTO Finance Administrator • \$10,000 - Provide a one-time training fund to support the onboarding of the MHTO Finance Administrator • \$561,474 – Donated to Pond Inlet to-date from Sponsorship/Donations Program • \$110,000 for Pond Inlet High School and Elementary School Lunch Program (Article 7.21) <p>Other benefit programs that are available to all 5 North Baffin community include:</p> <ul style="list-style-type: none"> • Community Research Vessel (Article 17.9) • \$750,000 – Wildlife Compensation Fund (Article 17.6) • \$275,000 – Business Capacity Start-up Fund (Article 6.3) • \$550,000 – Wellness Fund (Article 12.2) |

| | | <ul style="list-style-type: none">• Community Counsellor in each community through the Ilisaqsivik Society (Article 11.7) <p>Wages paid to employees within communities are also a direct community benefit. In 2019 Baffinland and its contractors employed 60 individuals from Pond Inlet and paid \$2.7 million in employee wages. As of June 30, 2020 Baffinland paid \$654, 584 in wages to Pond Inlet employees, and between March 31, 2020 and September 30, 2020 a further \$913, 260 was paid in standby wages to Pond Inlet employees. In addition to this, Baffinland also employs 4 shipping monitors in Pond Inlet each shipping season.</p> <p>Contracting with community firms is another form of direct community benefits. A table summarizing the value of contracts with Pond Inlet firms by year is provided here:</p> <table><tr><th>Year</th><th>Invoiced</th><th>Inuit Firms</th></tr><tr><td>2019</td><td>\$566,982.00</td><td>Inuarak Outfitting, Nunavut Outfitters, Tagak, Siku Taxi, Niqitaq Fisheries, Tununiq Sauniq Co-op</td></tr><tr><td>2020</td><td>\$173,808.00</td><td>Iglugili, Inuarak Outfitting, Siku Taxi, Niqitaq Fisheries, Tununiq Sauniq Co-op</td></tr></table> | Year | Invoiced | Inuit Firms | 2019 | \$566,982.00 | Inuarak Outfitting, Nunavut Outfitters, Tagak, Siku Taxi, Niqitaq Fisheries, Tununiq Sauniq Co-op | 2020 | \$173,808.00 | Iglugili, Inuarak Outfitting, Siku Taxi, Niqitaq Fisheries, Tununiq Sauniq Co-op |
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| No name provided with question | As Baffinland has not been able to deal with all the community concerns now, they should not be permitted to go to Phase 2 and have double the impacts. | Baffinland has been working directly with community representatives as well as the Qikiqtani Inuit Association to address on-going concerns with the current operation. Baffinland has made many meaningful changes to the operation as a result of community input and has supported the community in a variety of ways. The Phase 2 expansion includes many improvements in design to address long standing community concerns with dust and the provision of direct communicate benefits through a revised Inuit Impact Benefit Agreement. Stabilizing the company through increased production will let us continue to focus and improve on Inuit employment and contracting. It is our goal to deliver on our commitments and to increase the benefits of the Mary River project, while at the same time minimizing any potential impacts. | | | | | | | | | |
| Emily Onalik | I would like to ask Baffinland provide photos of Mary River and Milne Inlet in each season: Spring, Summer, and Winter from the year 2008 every year until 2019. Please show the land from the blatting points at Nulujaat to Milne Port. | Baffinland provides photos of the mine site and different activities annually through our annual reporting requirements, as well as social media. To access our annual monitoring reports, which would include photos like those requested, you can visit the Nunavut Impact Review Board or Nunavut Water Board public registries for the Mary River Project, or you can access all of our monitoring reports on the Baffinland website - https://www.baffinland.com/media-centre/document-portal/ . | | | | | | | | | |

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| Emily Onalik | <p>Please explain how much you are taking care of the dust being generated.</p> | <p>Baffinland monitor's dust for detection up to 5 km away from the site and we compare this to reference samples that are 14 km away from the site. We have a number of methods used to reduce dust at the site most notably the use of dust suppressant along the road as well as new dust suppressant that will be used this year at the Stockpiles at Milne Port. Phase 2 will see a reduction of dust at the mine site and along the transportation corridor because of changes in the design - moving secondary crushing to an indoor facility and switching from ore haul trucks to a train system.</p> <p>There is a high degree of certainty on the geochemistry of dust from the project, since multiple years of dustfall chemistry data are available. The metals chemistry of the dust is mostly composed of iron, aluminum and manganese, which is not unusual since this is an iron ore mine. In general, metals that are reported to bio accumulate in food chains are present at low or very low (below detection limits) concentrations in dustfall near the Project. Therefore, the potential for bioaccumulation in food chains is considered low.</p> <p>Based on the assessment conducted, it is considered unlikely that ore dust deposition from the Project at the rates considered in this assessment would result in levels of metals in blueberries or caribou tissues that would be harmful to human health, if consumed. Similarly, it is considered unlikely that ore dust deposition from the Project would result in levels of metals in lichen that would be harmful to caribou health. This conclusion is based on consideration of the areas expected to be affected by dustfall, the predicted future soil and vegetation concentrations, and the home range of caribou.</p> <p>Health Canada has agreed with our assessment methods and our conclusions. There are detailed monitoring programs in place to measure dust on the land, in air, and in marine and freshwater environments. The results of these monitoring programs are reviewed carefully, and adaptive management programs are in place to reduce impacts on the environment. The adaptive management programs have been made stronger in the Phase 2 proposal, particularly related to air quality and dustfall. Dustfall thresholds have been set to protect lichen (caribou forage) and human health.</p> <p>Based on our current monitoring data there is no evidence of food chain contamination. This will continue to be monitored and if we saw a trend over two years, that would trigger adaptive management</p> |
| No name provided with question | <p>I have seen [Pond Inlet] change so much since the mine opened. Since last year the animals are hardly any now, I have a husband and son who are hunters to provide us meat but this year they didn't harvest.</p> | <p>Thank you for the comment. We respect and understand that Pond Inlet residents have seen changes in their environment and the community. Although changes in the environment are coming from a variety of sources, many of these changes have been attributed to the mine. The data that Baffinland has available to us shows that narwhal in particular are in similar abundance in the area as they were before the operation began. We also know that total numbers of narwhal harvested from Pond Inlet has seen increases or remained relatively stable since 2015. Regardless, we know that people are feeling changes in the hunting experience. In recognition that there would be changes experienced, Baffinland signed an Inuit Impact Benefit Agreement with the Qikiqtani Inuit Association to address impacts and provide for the benefits and opportunities for Inuit. Recent revisions include funding for specific programs to help offset the changes in harvesting Inuit have experienced in Pond Inlet, regardless of the</p> |

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| | | <p>cause. Baffinland provides two key funding sources to Pond Inlet that can enable harvesting, including an annual \$400,000 gas subsidy program for any Inuk over the age of 12, and the Tasiuqtiit Working Group, which is made of the Hamlet and MHTO, receives \$10,000 per vessel that passes Pond Inlet (\$370,000 paid to date over two seasons). Under Phase 2 Baffinland and QIA have negotiated additional harvester enabling programs, including an annual payment of \$750,000 to a regional fund, and a substantial \$1.3 million payment to the MHTO. The added value in these programs is that the funds are to be implemented by Inuit in a manner that works best for Inuit.</p> |
| Erica Koonark | <p>Since the pandemic started the Baffinland is giving only gas voucher only \$50-\$100 that is so sad! The Arctic Bay and other communities get caribou and foods, but Pond Inlet gets gas vouchers, that is so sad! Or help more to this community for caribou. Some elders are also craving for caribou and others. I know they are making so much money from our land. Baffinland is part of Pond Inlet and it's OUR LAND!</p> | <p>Baffinland was the first mining company in Nunavut to send its Nunavummiut employees home in the interest of their safety and the communities they live in. Since that time Baffinland has continued to pay wages for its Nunavummiut employees, despite the ongoing financial strains experienced by the Company under current operating conditions. This has not been the same experience for mining employees across the north.</p> <p>Since March 2019, the Company has donated over \$185,000 in Covid-19 food relief through partnership with Fednav, Arctic Co-operatives. We also donated cleaning supplies to help keep communities safe and healthy when such supplies were scarce. With the support of Baffinland Community Liaison Officers, vouchers for a cleaning kit were distributed to each household in Arctic Bay, Clyde River, Igloolik, Sanirajak, and Pond Inlet.</p> <p>To support Pond Inlet specifically, Baffinland has supplied Pond Inlet with direct community funding through the Harvesters Enabling Fund, and will make its third contribution to the Tasiuqtiit Working Group following this year's shipping season. The Tasiuqtiit Working Group is made of Hamlet representatives and the MHTO. The Working Group currently holds \$370,000 and will likely receive another \$140,000 in 2020. Under Phase 2 this annual contribution could reach up to \$1.18 million/year.</p> <p>Baffinland has and will continue to make significant contributions to food banks, schools, municipal governments, and the Mittimatalik Hunter and Trapper Organization (MHTO) to support food programs for those in need.</p> |
| Erica Koonark | <p>We've been hearing that there is COVID-19 in other mines. I want Baffinland to be closed because it might be spreading it too.</p> | <p>Baffinland was the first mining company in Nunavut to send its Nunavummiut employees home in the interest of their safety, as well as the communities they reside in. Under these circumstances there is no connecting between the mine and the communities that could create a pathway for the transmission of COVID19. As long as the Company and communities continue to abide by public health measures implemented by the Government of Nunavut, the Company and continue operating while communities remain safe.</p> |
| No name provided with question | <p>Ever since Baffinland started, our mammals, Baffinland saying mammals wont effect but it did. This year not much Arctic Char, seals, narwhal, etc. and closed the Baffinland because no people from</p> | <p>We respect and understand that Pond Inlet residents have seen changes in their environment and the community. Although changes in the environment are coming from a variety of sources, many of these changes have been attributed to the mine. The data that Baffinland has available to us shows that narwhal in particular are in similar abundance in the area as they were before the operation began. We also know that total numbers of narwhal harvested from Pond Inlet has seen increases or remained relatively stable since 2015. The exception to this was in 2018 when heavier than normal ice conditions were present and a lower number of narwhal were harvested. In response to this occurrence Baffinland carried out two years of aerial survey work to better</p> |

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| | <p>Pond Inlet is working there and you guys are destroying my hunting ground for money.</p> | <p>understand where narwhal were located in the region, and in what numbers. Baffinland also implemented transit restrictions and a 40km buffer zone from the edge of the regional study area to reduce potential disturbance to narwhal during their migration. In 2019 Baffinland's monitoring programs confirmed the population of narwhal to be consistent with previous estimates by DFO, and believes its mitigation measures have been effective. Regardless, we know that people are feeling changes in the hunting experience. In recognition that there would be changes experienced, Baffinland signed an Inuit Impact Benefit Agreement with the Qikiqtani Inuit Association to address impacts and provide for the benefits and opportunities for Inuit.</p> <p>On subject of people from Pond Inlet not working at the mine, in 2019 Baffinland and its contractors employed 60 individuals from Pond Inlet and paid \$2.7 million in employee wages. As of June 30, 2020 Baffinland paid \$654, 584 in wages to Pond Inlet employees, and between March 31, 2020 and September 30, 2020 a further \$913, 260 in standby wages were paid to Pond Inlet employees. In addition to this, Baffinland also employs 4 shipping monitors in Pond Inlet each shipping season.</p> |
| No name provided with question | <p>The pattern is that every meeting with Baffinland is so tied up with environmental issues that the community and culture impacts are pushed to the side and not adequately addressed.</p> | <p>Community concerns often raised are related to the environment during our open discussion periods. That is not to say though that socio-economic concerns are not raised or discussed. Baffinland sits on the Qikiqtaaluk Socio-Economic Monitoring Committee which has representatives from the Government of Nunavut, Government of Canada, the Qikiqtani Inuit Association and each of the Qikiqtani Hamlets. A wide variety of participants are required at these meetings because community and socio-economic issues are broad ranging and require support from across government and industry.</p> <p>Through the QSEMC and our own socio-economic monitoring program we also engage with service providers in Pond Inlet such as the RCMP and the community health centre to better understand what is happening in the community and where the mine may be influencing change. These meetings and discussions have led to the development of training programs, funding for Councilors in each community and funding for the Ilagiiktunut Nunalinnull Pivalliajutisait Kiinaujat Fund. These programs are run in each community to better support the integrity of the community and those who live there.</p> |
| No name provided with question | <p>It would be less messy on ore rocks that go to docks, and there were mill where they would store them to pick up, but because they just develop them..., and the wind blew away to sea ice.</p> | <p>In 2020 Baffinland will be applying a paper cellulose product to be sprayed onto the stockpiles at the port site. The product will form a crust on the outside of the stockpile. This spray is intended to prevent liftoff/dust emissions from the stockpile itself.</p> |
| NAC Office Administration Program | <p>Jobs lost for people if railway is built</p> | <p>No Inuit will lose their job as a result of Phase 2. Any Inuit currently working as ore haul truck drivers will have the choice to train for a new position. In general, Phase 2 will open more doors for Inuit employment and training, not reduce them.</p> |

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| NAC Office Administration Program | Traditional hunting grounds has been dramatically affected. The animals we rely on caribou, fish and seals. | Thank you for the comment. We respect and understand that Pond Inlet residents have seen changes in their environment and the community. Although changes in the environment are coming from a variety of sources, many of these changes have been attributed to the mine. The data that Baffinland has available to us shows that narwhal in particular are in similar abundance in the area as they were before the operation began. We also know that total numbers of narwhal harvested from Pond Inlet has seen increases or remained relatively stable since 2015. The exception to this was in 2018 when heavier than normal ice conditions were present and a lower number of narwhal were harvested. In response to this occurrence Baffinland carried out two years of aerial survey work to better understand where narwhal were located in the region, and in what numbers. Baffinland also implemented transit restrictions and a 40km buffer zone from the edge of the regional study area to reduce potential disturbance to narwhal during their migration. In 2019 Baffinlands monitoring programs confirmed the population of narwhal to be consistent with previous estimates by DFO, and believes its mitigation measures have been effective. Regardless, we know that people are feeling changes in the hunting experience. In recognition that there would be changes experienced, Baffinland signed an Inuit Impact Benefit Agreement with the Qikiqtani Inuit Association to address impacts and provide for the benefits and opportunities for Inuit. This agreement has seen one revision since mine operations began and will continue to be revised throughout the life of the project. Recent revisions include funding for specific programs to help offset the changes in harvesting Inuit have experienced in Pond Inlet, regardless of the cause. Baffinland funds programs to provide a gas subsidy for any Inuk above 12 years old, wildlife monitoring programs so that studies can take place according to community priorities and supports the exchange of country food between communities. These are some of the ways the Company tries to offset the negative experiences with harvesting that people are feeling. |
| NAC Office Administration Program | Animals are turning red from ore dust. | Baffinland monitor's dust for detection up to 5 km away from the site and we compare this to reference samples that are 14 km away from the site. We have a number of methods used to reduce dust at the site most notably the use of dust suppressant along the road as well as new dust suppressant that will be used this year at the Stockpiles at Milne Port. Phase 2 will see a reduction of dust at the mine site and along the transportation corridor because of changes in the design - moving secondary crushing to an indoor facility and switching from ore haul trucks to a train system. |
| NAC Office Administration Program | Kugluktuk Bay fish has dramatically decreased. No huger fish this year and hunters seen dead fish in the river. Small landlocked fish were spotted only. | Changes in fish size and any fish mortality that was seen by local hunters in Koluktoo Bay are unlikely to be related to the Project, as the annual marine environmental effects monitoring program (MEEMP) has not identified detectable changes in local fish communities in areas closer to Port activities to date. The MEEMP has also found that water quality, sediment quality, and fish tissue metals levels have been generally consistent with previous years. In the Technical Meetings of September 2020, Baffinland committed to working with the MHTO to complete surveys for the presence of arctic char in Qurluqtuk Lake which feeds into Koluktoo Bay. This monitoring program will be helpful in providing information which can shed further light on questions community members have about arctic char fish in this river system. |
| NAC Office Administration Program | For winter transportation - if it is approved what are the plans for the hunters? If the bridge has to be used will the hunters have coverage for | Baffinland is proposing to ship no earlier than July 1 and no later than November 15 as part of Phase 2. The dates that Baffinland ships between each year will ultimately be driven by ice conditions, as Baffinland has committed not to ship through landfast ice or when the floe edge is still being used by hunters. Baffinland is not proposing to ship during the winter. Winter shipping was briefly considered when Phase 2 was first proposed but was removed based on community preference. |

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| | insurance if an accident would occur during the ship passing or the bridge crossing? | Ice bridges can only be used in winter months when ice is landfast and stable enough to assist snowmobiles in crossing the tracks left behind by icebreakers. Because Baffinland is only shipping through mobile ice that is naturally breaking up at the beginning of the season, or forming at the end of the season, ice bridges are not applicable to Phase 2. |
| NAC Office Administration Program | Does the BIM environmental team know that once the winter shipping starts it will have a huge impact on Pond Inlet residents as our main diet is seal now. | Please see above and note that Baffinland is not proposing to ship during the winter season. |
| NAC Office Administration Program | The mine has started? Winter shipping will create the crack and once the sun is back the crack will start to melt rapidly and making ice dangerous for hunting. We travel with our family to go seal hunting in spring and this creates closeness to family which makes people happier. The skin is used for clothing. The winter shipping will take our livelihood and have to rely on store-bought foods and clothing. Baffinland will not even help us with the high cost of living here. Gas vouchers have help 10% of our life but we are now eating less and less caribou, fish, and seal because of the ships and the dust and the migration area is now a job site. | <p>Baffinland is not proposing to ship during the winter. Shipping will occur through the break up period in the spring, and the early formation period in the fall but each period is generally brief (3-week average duration over the last 27 years) and our vessels are not expected to meaningfully impact the presence of ice during those times. We have also introduced a number of additional practices that limit the overlap with Inuit use of the ice, which includes waiting for confirmation that the floe edge is closed for hunting, asking our vessels to wait at least 40km away from the floe edge and waiting until the landfast ice has broken along the entire ship track. Both the current shipping season and proposed shipping season for Phase 2 also do not overlap with sensitive life periods for seals. These measures have all been put in place to reduce the impact on Inuit harvesting and the health of animals. The health and safety of our employees and residents of the North Baffin is a top priority of Baffinland and any safety concerns with our shipping season will be understood and discussed through the MHTO on an ongoing and annual basis.</p> <p>In recognition that there would/will be changes experienced, Baffinland signed an Inuit Impact Benefit Agreement with the Qikiqtani Inuit Association to address impacts and provide for the benefits and opportunities for Inuit. Recent revisions include funding for specific programs to help offset the changes in harvesting Inuit have experienced in Pond Inlet, regardless of the cause. Baffinland provides two key funding sources to Pond Inlet that can enable harvesting, including an annual \$400,000 gas subsidy program for any Inuk over the age of 12, and the Tasiuqtiit Working Group, which is made of the Hamlet and MHTO, receives \$10,000 per vessel that passes Pond Inlet (\$370,000 paid to date over two seasons). Under Phase 2 Baffinland and QIA have negotiated additional harvester enabling programs, including an annual payment of \$750,000 to a regional fund, and a substantial \$1.3 million payment to the MHTO. The added value in these programs is that the funds are to be implemented by Inuit in a manner that works best for Inuit.</p> |
| NAC Office Administration Program | Is it possible for BIM to stop operating for a year or a few (2021 or more) to get our animals back? Stop shipping, trucking, mining, blasting, or generally operating at least a year or a few. | What has been requested is called care and maintenance. There are only a few circumstances in which the company would consider entering a care and maintenance scenario, all of which have significant financial implications for the Company, and more importantly in our ability to provide financial and other support for the North Baffin communities. We believe that the Company, wildlife and Inuit can co-exist and we will continue to operate with that goal in mind. If in the future we find that Phase 2 is having impacts that were not anticipated, it will implement additional mitigation measures, this is called adaptive management. Under Phase 2 Baffinland and QIA are proposing a system where project based monitoring will be complimented by Inuit led monitoring, |

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| | | and both of these programs will inform the need to implement adaptive management, and some of the measures could include a reduction or suspension in the activities proven to be the source of the impact. This system and associated management plans are currently being developed and will be in place well in advance of Phase 2 operations commencing. |
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