



Hamlet of Sanirajak

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March 1, 2021

Nunavut Impact Review Board
VIA EMAIL (Info@NIRB.ca)

NIRB File No: 08MN053

Nunavut Impact Review Board's Review of Baffinland Iron Mines Corp.'s Phase 2 Development Proposal – Written Questions

Hamlet of Sanirajak Questions for Baffinland Iron Mines Corp.

1. During the Technical Meeting portion of the Hearing, I asked Baffinland if when there is a five-ship ore convoy whether this counts as one transit toward the 176 or whether it counts as five. The answer provided, “that it counts as one transit but that there will only be 176 ships” is ambiguous. If under the Phase 2 proposal Baffinland is allowed to have 176 transits and a five-ship convoy only counts as one transit, that would mean that they could have a total of 880 (5 x 176) ore ships if all ore ships were to travel in five-ship convoys. Could Baffinland confirm that the maximum number of ore ships that could be used in a single year under the Phase 2 proposal is 176 irrespective of whether some or all of the transits are done in convoys of greater than one ore ship?
2. Baffinland advised that ore ships travel in convoys as large as five ore ships at a time and they also said that up to three ore ships at a time could be anchored at Ragged Island. Prior to the construction of the second ore dock, one of the five ships could be at the dock and three of the five ore ships could be at the Ragged Island anchorage. Where would the fifth ship be located if it were to be anchored? If not anchored, where would it be travelling?
3. Baffinland was asked whether the second dock under the Phase 2 proposal is solely required to handle Cape-sized vessels or whether it also is necessary to ship 12 MMT/A. The answer provided was that it would be required to both handle Cape-sized vessels and to ship 12 MMT/A. In Oceans North's presentation at the Hearing, Chris Debiski highlighted Baffinland's documents filed that show the number of transits and the dry weight information of the ships actually used in 2019. An analysis of this information (Appendix 1, attached) shows that if Baffinland were to use the same ratio of Supermax, Panamax and Post-Panamax vessels as those actually used in 2019, they could ship 13.1 MMT/A; this is 9% more than the requested shipping level of 12 MMT/A. If they were able to do away with using Supermax vessels and were able to attain an equal amount of Panamax and Post-Panamax vessels, they could ship 13.7 MMT/A; this is 14% more than the requested shipping level of 12 MMT/A. If they were able to attain shipping with all Post-Panamax vessels, they could ship 14.3 MMT/A; this is 19% more than the requested shipping level of 12 MMT/A. This calls into question Baffinland's statement that the second ore dock is in part required to ship 12 MMT/A. To help verify whether the second ship loader and second dock are required or not to ship 12 MMT/A, could

Baffinland please provide the average number of tones of lumps and / or fines per hour that can be loaded into ships using its existing ship loader and the average time it takes for one ore ship to leave the existing dock until the next one is at dock and ready to be loaded?

4. In responding to a question of the World Wildlife Fund regarding the use of heavy fuels that cause black carbon emissions, Baffinland indicated that it would use distillate fuels that do not emit black carbon after the new regulations are fully phased in, which would not be until 2029. As part of the explanation provided by Baffinland, it stated that distillate fuels are far more expensive. In the intervention provided by Fisheries and Oceans Canada, they stated there is a small price difference between heavy fuels and distillate fuels. Fisheries and Oceans Canada also stated that the use of distillate fuels is already required for ships in the North Sea where Baffinland's ships deliver ore to Rotterdam. Could Baffinland provide what the Phase 2 cost per year would be of complying with the Fisheries and Oceans Canada recommendation that Baffinland only use distillate fuels within Canada's 200-mile Economic Zone?
5. Given the severe damage to the environment that would occur should there be a major oil spill by one of Baffinland's ships while in Milne Inlet or Eclipse Sound, will Baffinland commit to immediately requiring all its ships to start using distillate fuels within Canada's 200-mile Economic Zone. If Baffinland would not commit to requiring all its ships to immediately start using distillate fuels within Canada's 200-mile Economic Zone, would it commit to start using distillate fuels within Canada's 200-mile Economic Zone should it receive approval for its Phase 2 proposal?

Yours truly,



Louis M. Primeau, B.Comm., CPA-CMA, CPA-CGA
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Appendix 1 - Analysis of Baffinland Iron Mines Corp.'s Shipping

Analysis of 2019 Shipping - Actual Volume by Vessel Type

Ship Tyoe	DWD	Trips	Total DWD	Average DWT
Panimax		59450	2	118,900
Panimax		59450	2	118,900
Panimax		75750	2	151,500
Panimax		74753	2	149,506
Panimax		74524	2	149,048
Panimax		75000	2	150,000
Panimax		74138	2	148,276
Panimax		75725	2	151,450
Panimax		74232	2	148,464
Panimax		75825	2	151,650
Panimax		74300	2	148,600
Panimax		74052	2	148,104
Panimax		75750	2	151,500
Panimax		75744	2	151,488
Panimax		74849	2	149,698
Panimax		76180	3	228,540
Panimax		76180	3	228,540
Panimax		75603	3	226,809
Panimax		76180	3	228,540
Panimax		75603	3	226,809
Panimax		76180	3	228,540
Panimax		74518	3	223,554
Panimax		74559	3	223,677
Panimax		76118	1	76,118
Panimax		76167	1	76,167
Panimax		75354	2	150,708
Panimax		76404	3	229,212
		61	4,534,298	74,333
Post-Panimax		81795	1	81,795
Post-Panimax		81792	1	81,792
Post-Panimax		81792	1	81,792
Post-Panimax		81200	2	162,400
Post-Panimax		81200	2	162,400
Post-Panimax		80943	2	161,886
Post-Panimax		80866	1	80,866
Post-Panimax		80839	2	161,678
Post-Panimax		79471	1	79,471
Post-Panimax		81243	1	81,243
Post-Panimax		81631	1	81,631
Post-Panimax		79520	1	79,520

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Analysis of 2019 Shipping - Actual Volume by Vessel Type

Ship Tyoe	DWD	Trips	Total DWD	Average DWT
		16	1,296,474	81,030
Supermax	56348	3	169,044	
Supermax	56348	2	112,696	
		5	281,740	56,348
Total		82	6,112,512	

Proration of 176 ships based upon 2019 actual:

	Trips	Average DWD	Total DWD
Panimax +61/82*176	131	74,333	9,737,591
Post-Panimax+16/82*176	34	81,030	2,755,007
Supermax +5/82*176	11	56,348	619,828
			<u>13,112,426</u>

Based upon 2019 vessel mix, this would provide 9% operational flexibility without creation of second dock 1.09

Panimax	88	74,333	6,541,282
Post-Panimax	88	81,030	7,130,607
			<u>13,671,889</u>

Equal number panimax and post-panimax would provide 14% operational flexibility without creation of second dock 1.14

Post-Panimax 176 81,030 14,261,214

All post-panamax would provide 19% operational flexibility without creation of a second ore dock 1.19