

Environmental Protection Operations Directorate  
Prairie & Northern Region  
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ECCC File: 6100 000 011/001  
NIRB File: 08MN053

April 8, 2021

Via email to: [info@nirb.ca](mailto:info@nirb.ca)

Nunavut Impact Review Board  
29 Mitik Street  
P.O. Box 1360  
Cambridge Bay, NU X0B 0C0

**RE: 08MN053 - Nunavut Impact Review Board – Mary River Phase 2 - Baffinland Iron Mines Corporation Potential Term and Condition for distillate fuel use**

Environment and Climate Change Canada, as part of a Final Written Submission and during the Final Hearing that took place in February and March 2021, put forward a recommendation that the Proponent use distillate fuel (or equivalently performing fuel) when operating ore carrier vessels in the Canadian Exclusive Economic Zone, in order to reduce black carbon emissions. Distillate fuel has been determined by the International Maritime Organization (IMO) to produce 80% less black carbon emissions than heavy fuel oil. Any other fuel proposed for use by Baffinland would have to meet this same level of mitigation.

Environment and Climate Change Canada proposes that this recommendation be included as a Term and Condition in the Project Certificate, and proposes the following potential language:

**The Proponent shall require ore carrier vessels to use 0.1% Sulphur Marine Gas Oil (MGO; distillate fuel) while they are travelling through the Canadian Exclusive Economic Zone (200 nautical miles from shore, inclusive of the Nunavut Settlement Area and Regional Study Area).**

**The Proponent may also use equivalent-performing alternatives to achieve mitigation of atmospheric black carbon emissions. An equivalent-performing alternative is a fuel that reduces black carbon emissions by at least 80% (the mitigation level provided by MGO) compared to emissions from the combustion of heavy fuel oil. Such an alternative fuel must be confirmed to achieve this standard by a consensus-based internationally recognized scientific report such as the 4th IMO Greenhouse Gas Study, Arctic Monitoring and Assessment Programme under the Arctic Council, or the United Nations Framework Convention on Climate Change.**

**Reporting Requirements: The Proponent shall provide vessel fuel records (including fuel identification, locations of fuel changes, and quantity consumed) to the Nunavut Impact Review Board as part of their Annual Report, for review.**

ECCC thanks the Nunavut Impact Review Board for the opportunity to provide comments in this matter.

Sincerely,

A handwritten signature in black ink, appearing to read 'Margaret', with a stylized flourish at the end.

Margaret Fairbairn  
Acting Regional Director