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Nunavut Field Unit  
Parks Canada Agency  
Box 278  
Iqaluit, NU X0A 0H0

January 10, 2022

Nunavut Impact Review Board (NIRB)  
PO Box 1360  
Cambridge Bay, NU X0B 0C0

Dear NIRB,

**Subject: Baffinland Iron Mines Corporation's Mary River Phase 2 Project – Closing Statement**

Thank you for providing the opportunity to submit a closing statement regarding Baffinland's Phase 2 project review. As outlined in Parks Canada's submissions and presentation, the shipping component of Baffinland's Phase 2 proposal is located beside Sirmilik National Park and within Tallurutiup Imanga National Marine Conservation Area (TINMCA).

Throughout the Phase 2 environmental assessment process, Parks Canada has identified a number of concerns including the risk of introduction of aquatic invasive species from ballast water as well as effects to marine mammals from increased shipping and ice breaking. It is clear that uncertainties remain regarding these impacts and their extent cannot be defined. As a result, Parks Canada recommends NIRB consider the precautionary principle and the protected area context when making its decision on the significance of impacts.

Parks Canada's recommendations identified in our presentation, submitted in January 2021, are still valid. They include recommendations for a robust and enforceable project adaptive management program; an effective Marine Environment Working Group and; the commitments and recommendations that have been proposed between Baffinland, Fisheries and Ocean's Canada and Transport Canada be prescribed by terms and conditions.

Throughout this review process, Parks Canada's interventions have been consistent with the Agency's mandate and the Inuit Impact and Benefit Agreement for TINMCA



which recognizes that the ecosystem health and biodiversity of the national marine conservation area are of fundamental importance to Inuit and Canadians.

If you have any questions, please contact Allison Stoddart at (819) 661-0283, or by email at [allison.stoddart@pc.gc.ca](mailto:allison.stoddart@pc.gc.ca).

Sincerely,

Jenna Boon  
Field Unit Superintendent