

APPENDIX B - FINAL TABLE OF COMPLETED COMMITMENTS

APPENDIX B: FINAL TABLE OF COMPLETED COMMITMENTS

ID#	FWS ID#	Intervener	Topic	Review Phase	Commitment	Current Status	Notes
226	NEW	QIA	Marine Environment	5 - Public Hearing 2021	Baffinland commits to providing Passive Acoustic Monitoring Results from fall 2019 and early-summer 2020, at the latest, 30 days from the release of the NIRBs Recommendation Report to the Minister.	Complete	Provided in 2020 PAM Report
212	NEW	MHTO QIA	Atmospheric Environment	5 - Public Hearing 2021	Baffinland continues to implement dust mitigation solutions at the Milne Port ore stockpiles and has retained a third party consultant to further review the effectiveness of the DusTreat application. Through this investigation and consultation with the QIA and MHTO alternatives to the current mitigation measures will be evaluated as contingency. As this work is ongoing for the current operation Baffinland proposes to host a workshop with interested parties in Q2 2021.	NA	Replaced by commitments 230 and 232
211	QIA-01 QIA-02	QIA	Terrestrial Environment	5 - Public Hearing 2021	Baffinland commits to working with the TEWG and the Inuit Committee to update the Caribou Protection Measures for the Mary River Project within 6 months post-PC. Baffinland commits to funding a caribou-focused IQ study with the HTOs and QIA with 6 months post-PC. The IQ study will be scoped to ensure that it builds upon existing well-documented IQ, and includes verification of this information with Inuit knowledge holders. The results of this study will be used by QIA, the HTOs, the Inuit Committee and Baffinland to further update the Caribou Protection Measures, develop a Caribou Protection Map and project protection zones, and inform monitoring, mitigations and thresholds established through the Inuit Committee and the TEWG.	NA	Replaced by commitment 223
185	DFO-3.6.4 DFO-3.6.6	DFO	Marine Environment	3 - September 2020 - Technical Meetings	Baffinland and DFO will provide an update on DFO Comment 3.6.4 and 3.6.6 following bilateral discussions	Complete	See DFO 3.6 series of commitments
183	HPI	HPI	Corporate Environment	3 - September 2020 - Technical Meetings	Baffinland will provide a list of participants to each Hamlet and HTO from the North Baffin impacted communities who were present in the North Baffin community meetings reported in the February 2020 community update submission to the NIRB.	Complete	Provided in community engagement update
182	MHTO	MHTO	Marine Environment	3 - September 2020 - Technical Meetings	Baffinland will look into the feasibility of installing acoustic monitoring equipment at the floe edge.	Complete	Recorder Installed in Fall 2021, will record through Fall 2021 and Spring 2022 shoulder seasons
181	GN-TRC24	GN	Marine Environment	3 - September 2020 - Technical Meetings	Baffinland will support a revised Term and Condition 103 that reflects and incorporates the commitment made in relation to GN-TRC24. This commitment will be reflected in an updated commitment list. "Baffinland will provide maps with its Annual Reports that illustrate tracks taken by each Project-related ship within the RSA and Baffin Bay, relative to recorded ice coverage. (3) Every 3 years Baffinland will conduct an analysis of ship tracks through Baffin Bay in relation to sea ice to assess the extent of Project shipping's interaction with sea ice in Baffin Bay. Results to be reported in the Annual Report." (June commitment from Baffinland) (GN comment TRC 24)	Replaced	Replaced by updated commitment, line 210
180	QIA-08	QIA	Socio-economic Environment	3 - September 2020 - Technical Meetings	Baffinland and the QIA will work to provide more details on the CRLU Risk Community strategy (QIA 08), including a review of the commitment wording to ensure that it is clear that Baffinland will be working with Inuit on the development of this strategy.	Complete	Term and Condition Proposed in revised draft PC005
179	GN-TRC24	GN	Marine Environment	3 - September 2020 - Technical Meetings	Baffinland is committed to preparing a memo which includes a fuel spill risk assessment on polar bears, consistent with the risk assessment framework applied in Section 10 of the Phase 2 Addendum.	Complete	Submitted Oct 16, 2020
175	MHTO	MHTO	Corporate Environment	3 - September 2020 - Technical Meetings	For the duration of the Phase 2 Review Baffinland will prepare and provide public records of all engagement and consultation meetings with MHTO, which include the number of people in attendance, a record of questions comments and concerns raised, as well as copy of any materials provided by Baffinland or other parties as applicable.	Complete	Ongoing for the Community Engagement Updates Provided prior to each review milestone
174	MHTO	MHTO	Marine Environment	3 - September 2020 - Technical Meetings	Baffinland commits to reviewing proposed ecological triggers from the MHTO for the fall season if they can provide dates and supporting and verified IQ.	Complete	Ecological triggers and rationale by MHTO not supplied.
173	GNDFO	GN	Corporate Environment	3 - September 2020 - Technical Meetings	Baffinland will provide a technical memo providing additional details on Operational Flexibility.	Complete	Submitted Sept 30, 2020
172	MHTO	MHTO	Freshwater Environment	3 - September 2020 - Technical Meetings	Baffinland commits to work with the MHTO to achieve the objective of PC Term and Condition 48(a)	Complete	Initiative under existing Project; MHTO supported 2021 Program
171	MHTO	MHTO	Terrestrial Environment	3 - September 2020 - Technical Meetings	Baffinland will meet with the MHTO to discuss their specific objectives with respect to local caribou monitoring programs	Complete	Meeting minutes submitted as part of community engagement updates
169	MHTO-4a	MHTO	Marine Environment	3 - September 2020 - Technical Meetings	Baffinland commits to working with MHTO to better understand any issues relating to sea ice use between October 15 and October 31.	Complete	Meeting minutes submitted as part of community engagement updates

APPENDIX B: FINAL TABLE OF COMPLETED COMMITMENTS

ID#	FWS ID#	Intervener	Topic	Review Phase	Commitment	Current Status	Notes
166	HPI	HPI	Corporate Environment	3 - September 2020 - Technical Meetings	Baffinland commits to provide the January EA Workshop to each Hamlet and HTO from the North Baffin communities who participated in, with the caveat that this summary report will be unverified by participants.	Complete	Submitted Oct 16, 2020
165	QIA-01 QIA-02	QIA	Terrestrial Environment	3 - September 2020 - Technical Meetings	Baffinland commits to compile all commitments related to caribou in a single document for review by relevant parties	Complete	This has been achieved through reorganization of this commitment list
164	QIA-01 DFO-3.4 NEW PCA-02 WWF-FWS-03	QIA	Terrestrial Environment Marine Environment	3 - September 2020 - Technical Meetings	Baffinland will provide an updated draft revised terms of references for the marine and terrestrial working groups, including notes provided by other parties, by October 16.	Complete	Submitted on or before October 16, 2020
158	QIA-02 GN-03	QIA	Terrestrial Environment	3 - September 2020 - Technical Meetings	Baffinland will provide the full cut and fill profile of the north rail in relation to the potential caribou movement corridors to the QIA and GN. The figures will be colour-coded to show cut and fill profiles categorized into <1 m, 1-2 m, and >2 m profiles.	Complete	Submitted on or before October 16, 2020
149	QIA-40	QIA	Atmospheric Environment	3 - September 2020 - Technical Meetings	Baffinland will provide an update on the development of the Climate Change Strategy 15 days prior to a Public Hearing. A full draft is expected by December 31, 2020 and a final copy by June 30, 2021. Baffinland will endeavor to meet the requested timeline, but this should not be viewed as a barrier to moving forward with a Public Hearing as this is an ongoing operational commitment.	NA	Replaced by Commitment Line 221
148	QIA-41	QIA	Freshwater Environment	3 - September 2020 - Technical Meetings	Baffinland is prepared to adopt a more precautionary moderate risk threshold for lake sedimentation. The current moderate risk threshold for lake sedimentation is 1 mm, adopted from the FEIS. Baffinland will adopt the lake sedimentation rate predicted in the FEIS of 0.54mm, which is about half the current threshold. A low risk threshold of 0.15 mm will also be applied that will trigger corresponding low risk response actions.	Replaced	Replaced by Commitment Line 200
147	QIA-42	QIA	Freshwater Environment	3 - September 2020 - Technical Meetings	The commitment made under QIA 42 will be amended to reflect the following: Metrics on fish health (fish presence, catch per unit effort, fish length and fork length) are collected from 60 crossing sites along the Tote Road and reported annually to DFO, as well as in the Annual Report for Operations to the QIA and NWB, as well as the Annual Report for the NIRB. Baffinland already monitors water quality and sediment quality as part of the Tote Road Monitoring Program, and we commit to add observations regarding physical condition of fish (e.g., lesions, injuries). Baffinland and QIA will determine an appropriate approach to analysis for the 2021 reporting period.	Replaced	Replaced by Commitment Line 201
146	QIA-42	QIA	Freshwater Environment	3 - September 2020 - Technical Meetings	Baffinland commits to coordinating freshwater focused workshops to address specific freshwater issues. Baffinland does not support the implementation of a regular occurring freshwater working group.	Replaced	Replaced by Commitment Line 202
141	QIA-51	QIA	Marine Environment	3 - September 2020 - Technical Meetings	Baffinland commits to provide a supplementary submission that documents actual vessel noise signatures as recorded during PAM, a comparison with the modelled noise outputs used in the assessment, and a discussion on how any differences, if they exist, affect the impact assessment or inform opportunities for mitigation and adaptive management. Baffinland notes that QIA has requested the details to be shared prior to a Public Hearing. Baffinland will endeavor to meet the requested timeline, but this should not be viewed as a barrier to moving forward with a Public Hearing.	Complete	Submitted with 2020 PAM Report
140	WWF	WWF	Marine Environment	3 - September 2020 - Technical Meetings	WWF has proposed Baffinland restrict the dumping from ore carriers of treated and untreated sewage and greywater in the RSA and restricting the use of open loop scrubbers. Baffinland is evaluating the feasibility of this proposal for Phase 2 and will provide an update prior to a Public Hearing.	Complete	See Commitment Line 235
120	DFO 3.4.1 NEW	DFO	Marine Environment	02 - February 2020 - Response to Updated Technical Comments	DFO and BIM are still working to update commitment wording from 3.4.1. DFO does not currently agree with the wording provided for 3.4.1. DFO continues to request that a specific monitoring plan for icebreaking/shoulder season be developed and will continue to work with BIM to find agreed upon wording for DFO 3.4.1 NEW. Baffinland has provided a draft Marine Monitoring Plan (MMP) as part of the Phase 2 review process. Should Phase 2 be approved, Baffinland will update this Plan to reflect all relevant commitments and terms and conditions.	Replaced	Replaced by new commitments to DFO 3.4 series
119	DFO 3.4.1 NEW	DFO	Marine Environment	02 - February 2020 - Response to Updated Technical Comments	Rather than develop a separate, stand alone monitoring plan specific to icebreaking as suggested by DFO, Baffinland will include a specific section relevant to icebreaking and shoulder season shipping activities in the MMP. Survey methodology and indicators (including rationale) will be determined in consultation with the MEWG, of which DFO is a member. Recommendations from MEWG members will be treated consistent with the consensus based decision requirements of the final updated MEWG Terms of Reference.	Replaced	Replaced by new commitments to DFO 3.4 series
118	DFO 3.4.1 NEW	DFO	Marine Environment	02 - February 2020 - Response to Updated Technical Comments	An updated draft MMP will be provided to the MEWG for comment and the NIRB within 180 days of issuance of an amended Project Certificate, should Phase 2 be approved. Baffinland commits to continue working with DFO and the MEWG to finalize the Plan.	Replaced	Replaced by new commitments to DFO 3.4 series

APPENDIX B: FINAL TABLE OF COMPLETED COMMITMENTS

ID#	FWS ID#	Intervener	Topic	Review Phase	Commitment	Current Status	Notes
117	DFO 3.4.3 NEW	DFO	Marine Environment	02 - February 2020 - Response to Updated Technical Comments	Baffinland commits to produce a response plan for the potential event of an ice entrapment, should this be observed during the annual end of season clearance surveys. This plan will include action level triggers and associated response actions. This plan will be developed in consultation with the MHTO and DFO, understanding that these two groups are ultimately responsible for determining the appropriate course of action should an entrapment event occur.	Replaced	Replaced by new commitments to DFO 3.4 series
116	DFO 3.5 NEW	DFO	Marine Environment	02 - February 2020 - Response to Updated Technical Comments	Baffinland will prepare and submit to DFO a literature review of ship-based marine mammal remote monitoring systems. This literature review will include a summary of commercially available remote wildlife monitoring systems that could be installed on vessels to supplement existing marine mammal monitoring programs and enhance detection of ship strikes on marine mammals. The remote monitoring systems identified in this literature review will inform adaptive management, should the need be triggered. For clarity, in the event of a ship strike on a marine mammal, a single event, although unlikely based on present mitigations (i.e. speed restrictions), would trigger an adaptive management response.	Complete	Replaced by new commitment to DFO 3.5
112	DFO 3.6.2 NEW	DFO	Marine Environment	02 - February 2020 - Response to Updated Technical Comments	Baffinland commits to record the Milne Port anchorage and associated coordinates where compliance testing and discharge occurs in the ballast water testing forms, completed by Baffinland's environmental monitors. A dataset with discharge coordinates will be provided to MEWG members as part of annual reporting requirements.	Replaced	Replaced by new commitment wording incorporating input from QIA
111	DFO 3.6.3 NEW	DFO	Marine Environment	02 - February 2020 - Response to Updated Technical Comments	Baffinland will require all vessels calling on Milne Port that treat their ballast under the D2 Standard to also perform a ballast water exchange prior to treatment. For ships unable to conduct exchange as specified in Canadian Ballast Water Regulations (e.g. ships on Canadian domestic trips), exchange is to be conducted as specified in revised ABWEZs for Eastern Arctic as per DFO CSAS advice (see DFO 2015, Stewart et al. 2015 and Goldsmit et al. 2019). This updated commitment will be reflected in the 2020 Standing Instructions to Masters.	Replaced	Replaced by new commitment wording incorporating input from QIA
110	DFO 3.6.4 NEW	DFO	Marine Environment	02 - February 2020 - Response to Updated Technical Comments	Baffinland will consider discontinuing exchange plus treatment requirements should treatment systems efficacy reach a point that makes the benefits of an exchange plus treatment system negligible. This decision will be made in consultation with TC and DFO, and will be based on a consideration of factors outlined in DFO 2019 (i.e. if ballast water organism concentration or composition, environmental conditions, shipping patterns, proportion of voyages meeting the D-2 standard, or available data describing these conditions change in the future, and updates to global research on ballast systems). In this event Baffinland will update ballast water dispersion modelling to more accurately reflect the spectrum of salinity, temperature, and discharge volumes that can be expected to be discharged at Milne Port under Phase 2 operations if prior exchange were to be discontinued.	Replaced	Replaced by new commitment wording incorporating input from QIA
108	DFO 3.6.6 NEW	DFO	Marine Environment	02 - February 2020 - Response to Updated Technical Comments	Baffinland remains committed to conducting ship hull biofouling monitoring surveys using an ROV on ore carriers, with focused efforts on areas of the hull and niche areas where biofouling has the greatest potential to occur (e.g. chain lockers, stern tube, rope guard, bottom, rubber side, etc.). The projected number of ore carriers that will be sampled annually will be determined in consultation with the MEWG, of which DFO is a member. Recommendations from MEWG members will be treated consistent with the consensus-based decision requirements of the final updated MEWG Terms of Reference.	NA	Replaced by new series of commitments to DFO
107	DFO 3.6.7 NEW	DFO	Marine Environment	02 - February 2020 - Response to Updated Technical Comments	Baffinland commits to updating the marine monitoring plan (MMP) in consultation with MEWG members and this will be completed prior to the start of the Phase 2 increased shipping season. The updated MMP will detail the revised MEEMP sampling design which includes greater seasonal and spatial coverage and increased sampling effort and sample sizes to address DFO concerns related to achieving sufficient statistical power for detection of project effects (≥ 0.8) (as per recommendations in DFO 2020, pages 4-7). <u>Background</u>The Aquatic Invasive Species (AIS) Monitoring Program is a biological screening program (species ID, presence/absence data); as such, it does not involve any statistical analysis. The updated MMP will include clear protocols for determining identity and status of species collected as part of this program (as per recommendations in DFO 2019 and DFO 2020 and comments on disposition table provided in June (DFO 3.8.1) and November (DFO 3.10.4). The sampling effort for the AIS Monitoring Program is currently very rigorous.	NA	Replaced by new commitment wording incorporating input from QIA
106	DFO 3.6.8 NEW	DFO	Marine Environment	02 - February 2020 - Response to Updated Technical Comments	Baffinland continues to maintain that the identification of high-risk biological species or groupings of species of concern is the primary responsibility of DFO. Despite this, Baffinland is committed to supporting the development of a trigger list of species and associated response plans through the process outlined in response to DFO 3.6.9 and 3.6.10, and to refining that list with DFO following Phase 2 approval.	NA	Replaced by new commitment wording incorporating input from QIA
101	ECCC-1 NEW ECCC-FC4	ECCC	Atmospheric Environment	02 - February 2020 - Response to Updated Technical Comments	Baffinland commits to investigate and implement black carbon reduction measures, where feasible, and provide a preliminary mitigation measure feasibility assessment 30 days prior to a Public Hearing, and a follow up report in the 2020 Annual Report (which wouldn't be until 2021). The feasibility assessment will consider the use of distillate fuels as a reduction measure for local black carbon emissions.	Complete	Submitted on or before October 16, 2020

APPENDIX B: FINAL TABLE OF COMPLETED COMMITMENTS

ID#	FWS ID#	Intervener	Topic	Review Phase	Commitment	Current Status	Notes
98	DFO 3.10.2 TC-02	DFO 3.10.2 TC	Marine Environment	01 - November 2019 - Public Hearing	Baffinland will revise the Ballast Water Management Plan to include a requirement for all vessels to conduct ballast water exchanges (with or without D2 treatment systems) prior to calling on Milne Port, until such a time that ballast water treatment systems are compliant with the D2 standards set by the IMO. Should Baffinland wish to discontinue the practice of exchange plus treatment, Baffinland will provide updated ballast water modelling that reflects the range of salinity that may be present in the ballast water tanks where no exchange occurs.	Replaced	Replaced by DFO 3.6 NEW Commitments
97	DFO 3.10.5	DFO	Marine Environment	01 - November 2019 - Public Hearing	Baffinland will update the AIS monitoring program to describe the process it follows for identifying high-risk biological species discovered through its sampling programs.	Replaced	Replaced by DFO 3.6 NEW Commitments
96	DFO 3.10.6	DFO	Marine Environment	01 - November 2019 - Public Hearing	Baffinland will work with DFO to develop a management and response approach in the event a non-indigenous species is identified during monitoring. This response approach will be added as an attachment to the AIS monitoring program.	Replaced	Replaced by DFO 3.6 NEW Commitments
90	DFO 3.5.4	DFO	Marine Environment	01 - November 2019 - Public Hearing	Baffinland is not proposing to ship during sensitive lifecycle periods for seal, which typically occur in the months between March and May. No additional mitigation measure is necessary for the current Shoulder Season Shipping Guide.	Complete	Baffinland has not changed the scope of proposed shipping to overlap sensitive lifecycle periods and the review is now complete
85	DFO 3.7.4	DFO	Marine Environment	01 - November 2019 - Public Hearing	An analyses will be conducted using data collected during the 2019 shipping season to characterize the degree of conservatism in the sound propagation modelling that has been conducted. Additional AMARs have been deployed and will collect data during the Fall 2019 and Spring 2020 seasons to further this analysis. See response to DFO 3.8.4 for commitment to long term acoustic monitoring.	Complete	Submitted with 2020 PAM program report
83	DFO 3.9.1	DFO	Marine Environment	01 - November 2019 - Public Hearing	Baffinland will implement an incidental marine mammal monitoring program with vessel operators calling on Milne Port, which will request incidental observations of marine mammals to be recorded and relayed to Baffinland. In support of this program, Baffinland will develop educational materials for vessel crew to assist in marine mammal identification and data recording. Baffinland will provide a draft of the materials and program for review by the MEWG before they are finalized.	Replaced	Replaced by Commitment in Line 115
82	DFO 3.10.3, DFO 3.10.4, TC-02, QIA-45, DFO-3.10.4, QIA-44	DFO	Marine Environment	01 - November 2019 - Public Hearing	Baffinland will implement a pilot ballast water biological monitoring program for ships calling on Milne Port. This program will be designed to reflect a more appropriately scoped form of a ballast water sampling protocol provided by DFO to Baffinland in 2017. This program will include sampling from one ballast tank on a total of five vessels per shipping season. Baffinland remains committed to continue conducting temperature and salinity test sampling of one randomly selected ballast water tank for all vessels calling to Milne Port, and biological sampling in the marine receiving environment to monitor for non-native species in Milne Port and at Ragged Island.	Replaced	Replaced by DFO 3.6 NEW Commitments
72	ECCC-FC4	ECCC	Marine Environment	01 - November 2019 - Public Hearing	Baffinland commits to investigate and implement black carbon reduction measures, where feasible, and report on this in the 2020 annual air quality report (to be submitted by March 31, 2021). The investigation will consider the use of distillate fuels as a reduction measure for local black carbon emissions.	Replaced	Replaced by ECCC-01 NEW Commitment
71	ECCC-FC-5	ECCC	Marine Environment	01 - November 2019 - Public Hearing	Baffinland remains committed to updating the Phase 1 Waste Rock Management Plan and evaluating the appropriateness of the 0.2% cutoff for PAG classification, irrespective of the Phase 2 approvals process.	Complete	Updated Phase 2 WRMP submitted in 2021
54	HPI	HPI	Socio-economic Environment	01 - November 2019 - Public Hearing	To further Baffinland's goal of meaningful consultation and engagement it has committed to the development of community-specific engagement guidelines. The development of these guidelines will serve to improve the two-way dialogue between the Company and Inuit.	Repeat	Same commitment as line 47
52	HPI	HPI	Socio-economic Environment	01 - November 2019 - Public Hearing	Pending approval of the Phase 2 Proposal, Baffinland has committed to provide \$1.2 million/year to each of the five North Baffin communities for the life of the mine (\$6 million/year total). These amounts are intended to support socio-economic opportunities, cultural opportunities, and hunter support opportunities.	NA	Replaced by ICA Commitments
49	HPI-11	HPI	Socio-economic Environment	01 - November 2019 - Public Hearing	Baffinland commits to working with the Hamlet of Mittimatalik: - to establish community-specific engagement guidelines, and - to ensure the active participation and representation of Mittimatalik on the Inuit Advisory Panel.	NA	Replaced by ICA Commitments
44	MHTO-5c	MHTO	Marine Environment	01 - November 2019 - Public Hearing	Baffinland is not proposing any additional shipping routes under the Phase 2 Proposal. This includes the use of Navy Board Inlet and the Northwest Passage.	Complete	No additional routes proposed
35	QIA-01, QIA-03, QIA-05, QIA-08, QIA-10, QIA-11	QIA	Socio-economic Environment	01 - November 2019 - Public Hearing	Baffinland and QIA will jointly develop a culturally appropriate component of the Culture, Resources and Land Use ("CRLU") monitoring program that addresses harvest surveys. Adaptive management measures will be informed by the results of the surveys and the CRLU monitoring program. This development will be completed within 12 months of the issuance of the amendment to the Project Certificate implementing Baffinland's Phase 2 proposal to align with the development and implementation of the CRLU monitoring program.	NA	Replaced by ICA Commitments

APPENDIX B: FINAL TABLE OF COMPLETED COMMITMENTS

ID#	FWS ID#	Intervener	Topic	Review Phase	Commitment	Current Status	Notes
34	QIA-01 QIA-02	QIA	Terrestrial Environment	01 - November 2019 - Public Hearing	Baffinland will continue to comply with the existing QIA caribou protection measures and will work with relevant IPG's as well as the TEWG and Inuit Advisors to develop a Caribou Protection Map and project protection zones, if and where appropriate to enhance caribou protection. Development of any Caribou Protection Map or project protection zones will take into account all relevant available IQ and scientific information, including results of an IQ study of caribou use with HTOs and QIA to be carried out through the CRLU Monitoring Program;	NA	Replaced by updated commitment, line 211
31	QIA-03	QIA	Socio-economic Environment	01 - November 2019 - Public Hearing	<ul style="list-style-type: none"> - Baffinland will carry out engagement with the 5 North Baffin communities during 2020 in order to identify, together with Inuit and in consultation with QIA, the specific metrics that Inuit identify should be monitored as part of the CRLU program, and to identify, together with Inuit and in consultation with QIA, thresholds for change that should trigger adaptive management by the company. - Baffinland would report on changes and trends in monitoring, based on previous reports. Baffinland will consider adaptive management actions and consult with the community on the best path forward in relation to any changes to CRLU identified through the CRLU monitoring program. For clarity, Baffinland would not only consider adaptive management in the event that effects exceed the FEIS addendum estimations but instead would have regard to triggers for action identified through consultation with the community. 	NA	Replaced by ICA Commitments
29	QIA-07	QIA	Socio-economic Environment	01 - November 2019 - Public Hearing	<p>Baffinland commits to integrating IQ into the objectives of its terrestrial and marine environmental management plans. Reporting will focus on the topics as outlined in the QIA's original technical comment:</p> <ol style="list-style-type: none"> 1. Show respect to animals; 2. Leave animals alone unless hunting them; 3. Animals are to be used, not wasted; 4. Each animal has its own habitat; and 5. Protect animal habitat. 	NA	Replaced by ICA Commitments
28	QIA-08	QIA	Socio-economic Environment	01 - November 2019 - Public Hearing	Baffinland commits to develop a risk communication strategy focused on gathering and dissemination of information to Inuit related to the Baffinland Iron Ore Mines Project, and linkages between the Project and human health and ecological risk assessment topics. The strategy will focus on building capacity within community groups to understand the mining process, elements of the mining process and how substances produced from the mining process move in the environment.	NA	BIM and QIA to determine integration with Inuit Stewardship Plan
27	QIA-21	QIA	Freshwater Environment	01 - November 2019 - Public Hearing	Implementation of the Water Compensation Agreement, particularly with respect to the integration of IQ, will require a collaborative effort between Baffinland and the QIA to which Baffinland remains fully committed. As a Water Compensation Agreement is required under Section 62 of the Nunavut Waters and Surface Rights Tribunal Act and Article 20 (Part 3) of the Nunavut Land Claims Agreement, Baffinland maintains that a process to establish compensation in respect of Inuit Water Rights exists and will be adhered to outside of the Project Certificate amendment process.	NA	Replaced by ICA Commitments
21	QIA-38	QIA	Socio-economic Environment	01 - November 2019 - Public Hearing	Baffinland commits to the development of socio-economic monitoring thresholds and actions, in consultation with the Mary River Socio-Economic Monitoring Working Group (SEMWG). Once finalized, these will be reflected in an updated Socio-Economic Monitoring Plan.	NA	Replaced by ICA Commitments
17	QIA-45	QIA	Marine Environment	01 - November 2019 - Public Hearing	Baffinland has committed to implementing a pilot ballast water biological monitoring program for ships currently only subject to the D1 standard (open water exchange). This program has been designed to reflect a more appropriately scoped form of a ballast water sampling protocol provided by DFO to Baffinland in 2017 and will include sampling from one ballast tank on a total of five vessels per shipping season. Baffinland remains committed to continue conducting temperature and salinity test sampling of one randomly selected ballast water tank for all vessels calling to Milne Port, and biological sampling in the marine receiving environment to monitor for non-native species in Milne Port and at Ragged Island.	NA	Replaced by DFO 3.6 NEW Commitments
10	TC-02 DFO 3.6.5	TC	Marine Environment	01 - November 2019 - Public Hearing	Transport Canada appreciates the efforts by BIM to ensure current regulations are followed with respect to their plans for ballast water management. Given the learning curve associated with use of ballast water treatment systems, for Phase 2, Transport Canada (TC) in consultation with Fisheries and Oceans Canada (DFO), recommends, in conjunction with present sampling and testing protocols being proposed/adopted [NTD - will be summarized in complete package] by BIM, that BIM implement a ballast water compliance sampling plan based on a risk based targeting methodology to be developed in consultation with DFO and TC. Such a risk based methodology should be applied to evaluate the risk of all vessel ballast water management (D1, D2) with subsequent salinity and D-2 biological compliance sampling conducted on vessels identified as high or very high risk. The respective risk based methodology and associated ballast water compliance sampling plan will be developed in consultation with DFO and TC following completion of DFO's Project specific sampling conducted on a subset of vessels calling to Milne Port. The risk based methodology and associated ballast water compliance sampling plan should include a consideration of other compliance initiatives or research being undertaken elsewhere by TC relative to implementation of the D-2 standard. Sampling conducted that supports building a body of knowledge for D-2 treatment systems, beyond biological compliance sampling conducted on high risk and very high risk tanks, should not compromise Baffinland's ability to transport annual ore quantities as approved under a modified Project Certificate No 005. Understanding that the rationale for this program is tied to a learning curve associated with the use of ballast water treatment systems, the compliance sampling program and risk based methodology will be adapted as deemed necessary based on the results of the program	Replaced	Replaced by Commitment in Line 109