

November 13, 2023

Cory Barker
Technical Advisor III
Nunavut Impact Review Board
P.O. Box 1360 Cambridge Bay, NU X0B 0C0
Sent via email: cbarker@nirb.ca

Re: Baffinland Response to the 2023 Marine Monitoring and Marine Mitigation Workshop Report for Mary River Project and NIRB Recommendations.

Dear Cory,

Thank you for providing Baffinland Iron Mines Corporation (Baffinland) with your *2023 Marine Monitoring and Marine Mitigation Workshop Report* and the Board's recommendations for the 2023 shipping season.

Baffinland would like to take this opportunity to address the report and is pleased to provide the Nunavut Impact Review Board (NIRB or Board) with a response to each recommendation (attached).

Should you have any comments or questions regarding Baffinland's responses, or the 2023 environmental marine monitoring program or shipping season, please do not hesitate to contact me at your convenience.

Regards,

A handwritten signature in black ink, appearing to read "Cortney Oliver".

Cortney Oliver
Sr. Manager, Environmental, Social & Governance

Cc: Megan Lord-Hoyle, Lou Kamermans, Lauri Corlett, Kelli Gillard

Attachment 1 – Table 1: Baffinland Response to NIRB's Recommendations from the 2023 2023 Marine Monitoring and Marine Mitigation Workshop Report

Attachment 1

Table 1: Baffinland Response to NIRB’s Recommendations from the 2023 2023 Marine Monitoring and Marine Mitigation Workshop Report

NIRB Recommendation		Baffinland Response
1	<p>The Board requests that Baffinland work closely with the Mittimatalik Hunters and Trappers Organization or other community organizations to determine priority marine hunting areas for the community members and to provide a memo to the Board by the end of 2023 on approaches to avoiding or coordinating navigation near these areas in such a way that reduces interaction between project vessels and Community vessels during peak harvesting periods.</p>	<p>Baffinland confirms it will engage with the MHTO in December 2023 for the regular post-shipping season engagement and time will be set aside to reconfirm priority marine hunting areas and approaches to reducing interaction between Project vessels during peak hunting season. We will provide a memo as requested to the NIRB after this meeting occurs, but the reporting memo to NIRB may not be available before the end of February 2024, as we would like to provide the MHTO with a draft copy for comment before it is provided to NIRB.</p> <p>MHTO has previously identified Koluktoo Bay, the western shoreline near Bruce Head and Navy Board Inlet as priority areas. As a direct result of our previous and ongoing engagements with the MHTO, we have implemented a number of mitigations to generally reduce the interactions between community and project vessels including: a dedicated shipping lane, no drifting in Eclipse Sound, and use of convoys. To ensure that the community and the hunters are aware of ship transits, Baffinland has shipping monitors located in Pond Inlet that communicate ore carrier locations via VHF radio. Facebook is another means used to communicate vessel movement with the community and posts are made approximately three times a day throughout the shipping season.</p>
2	<p>The Board encourages Baffinland to continue working with DFO and community members in monitoring Narwhal presence and health in the project area. Visual data from Bruce Head monitoring should be linked to results from underwater recorders as well as information about convoys to demonstrate conclusions made by Baffinland that conveying is mitigating disturbance impacts.</p>	<p>Baffinland confirms it will continue to collaborate with DFO and other parties, including community members in monitoring Narwhal presence and health. Baffinland’s shore based and aerial monitoring programs are regularly reviewed through the Marine Environment Working Group (MEWG), which includes DFO and North Baffin HTO’s. These programs collect information relevant to both narwhal presence (distribution and abundance) and health (body condition). In accordance with Commitment number 26 of Appendix B of the Project Certificate, Baffinland</p>

NIRB Recommendation		Baffinland Response
		<p>is also developing a cortisol sampling program proposal for consideration by harvesters from Pond Inlet and potentially Arctic Bay. A work plan is being developed, that if supported by harvesters, will provide an opportunity for this work to be implemented as early as the 2024 field season.</p> <p>Baffinland will include rationale supporting any conclusions regarding effectiveness of convoys for mitigating disturbance impacts in its annual reporting. However, linking visual data from Bruce Head monitoring to results from underwater recorders as well as information about convoys is something our technical experts advise is not practicable.</p>
3	<p>The Board requests that Baffinland provide more direct monitoring observations in engaging and plain language formats (i.e. audio and video) to support community members awareness of ongoing monitoring activities, results and findings at next year’s workshop. Baffinland is encouraged to also share more directly and with multi-media options, the experiences of Northern hires and monitoring staff as they conduct monitoring activities for the project</p>	<p>Baffinland appreciated the community’s interest in hearing the direct marine recordings played during the workshop, and will build on this approach in future workshops to increase engagement with community participants. We will also plan to work with staff and contractors to develop photo, video and/or audio materials sharing the experiences of Northern hires and monitoring staff as they conduct monitoring activities for the project (subject of course to the willingness of individuals to give consent and participate in this initiative for NIRB monitoring purposes).</p>