



March 20, 2024

Cory Barker
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Nunavut Impact Review Board
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Sent via email: cbarker@nirb.ca

Guillaume Daoust
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Re: The Nunavut Impact Review Board's 2022-2023 Annual Monitoring Report for the Mary River Project- Updates to Parties Comments on the 2022-2023 Annual Report (NIRB File No. 08MN053)

Dear Mr. Cory Barker and Mr. Guillaume Daoust,

Thank you for providing Baffinland Iron Mines Corporation (Baffinland) with your *2022-2023 Annual Monitoring Report for Baffinland Iron Mines Corp's Mary River Project*, which included the following instruction on Page 75 of the report:

Board Staff noted that on several occasions, as part of Baffinland's response to Parties Comments on the 2022 Annual Report, Baffinland would be providing follow-up analysis and updates to specific inquiries. Board staff expect these commitments to be tracked by Baffinland and suggests a summary table be provided to the Board within 60 days of issuance of the Monitoring Report to ensure these are follow-up with and Parties are receiving the information requested.

Baffinland would like to take this opportunity to provide the Nunavut Impact Review Board (NIRB or Board) with updates to the Parties requests through the 2022-2023 Annual Report comment Period, attached. Many of the Parties comments and requests will be addressed in the 2023 Annual Report to the NIRB or the 2023 QIA-NWB Report on Operations and therefore were not addressed here.

Should you have any comments or questions regarding Baffinland's updates, or require additional information then 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 (Baffinland), Kelli Gillard (NIRB)

Attachments

Attachment 1 – Table 1: Baffinland Response to NIRB's Recommendations from the 2022-2023 Annual Report

Attachment 1

Baffinland Response to NIRB's Recommendations from the 2022-2023
Annual Report

Table 1: Baffinland Commitment Updates

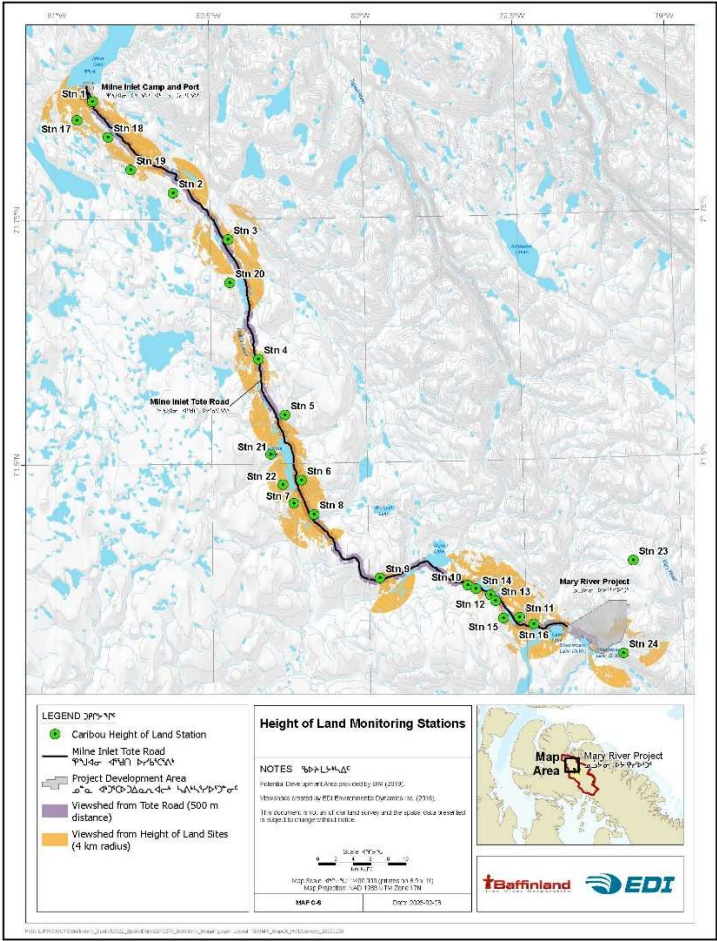
Original Cmt. #	Baffinland’s Original Response	Baffinland Update (Q1 2024)
QIA 2022 NIRB M&C # 2.	Baffinland is committed to fulfilling this Condition, whether through continued monitoring of relative sea levels or through a different, more suitable indicator. Baffinland commits to discussing alternative climate change indicators with the MEWG to effectively address PC Condition.	<p>Baffinland indicated that the tidal gauge component of the MEEMP would be removed from the 2023 monitoring program schedule at the February 15th, 2023 MEWG Meeting (p. 65 of minutes – Appendix C of 2022 NIRB Annual Report). No alternative climate change indicators were suggested by the MEWG members at that time and there were no concerns voiced about the removal of the component from the 2023 MEEMP program.</p> <p>Baffinland then received technical comments from the QIA (QIA 2022 NIRB M&AE #27 and QIA 2022 NIRB M&C #2), which requested that Baffinland continue to search for alternative approaches to comply with Term and Condition No. 1 in the Project Certificate. Baffinland has included this discussion as an agenda item at the Q2 2024 MEWG meeting.</p>
QIA 2022 NIRB AQ&N # 2.	Baffinland refers the author to the 2022 TEAMR, which outlines dust controls currently employed at the Project that are a result of adaptive management process since the start of operations. In addition to this Baffinland is currently conducting trials of a dust suppression product applied at the crusher equipment to coat the ore and reduce dust during subsequent material handling. A comprehensive summary will be included in the 2023 TEAMR regarding specific controls implemented during the 2023 calendar year. In addition to the current adaptive management efforts regarding dust described in the TEAMR, Baffinland also included an action toolkit in the draft revised Air Quality and Noise Abatement Management Plan (AQNAMP), released for public review on May 15, 2023. The action toolkit described possible actions to implement should a moderate or high risk level threshold be met, as described in the AQNAMP’s trigger, action, response plan (TARP).	Specific actions taken in 2023 include trials of a dust suppression product at the Crusher and on the Tote Road. Updates will be provided in the 2023 TEAMR including, a comprehensive summary of specific controls implemented during the year for dust management and information on the trials of dust suppression product applied throughout the material handling chain.
QIA 2022 NIRB AQ&N # 3.	<p>The pilot study was conducted in response to community, GN and QIA requests to determine whether monitoring at 2.0 m height was under-representing, or ‘missing’ dustfall closer to ground level. The results of the pilot study clearly demonstrated that there is no significant difference in the magnitude of dustfall from dust collectors operating at 2.0 m and those at 0.5 m above ground level throughout any season, but that there was elevated variability in the dustfall collected at the dustfall collectors operating at 0.5 m above ground level. This study confirmed that monitoring dustfall at the 2.0 m height, as per the standardized methodology, is the best means of measuring dust from the installed collectors. Dustfall will continue to be measured at a standardized height of 2.0 m at all monitoring stations. Other regulators, including Environment and Climate Change Canada (ECCC) have expressed a preference to see all Projects monitoring dustfall following the standardized methodology (see ECCC comments on Meadowbank dustfall monitoring program) (Agnico Eagle Mines Limited — Meadowbank Division 2019).</p> <p>Reference:</p> <p>Agnico Eagle Mines Limited — Meadowbank Division. 2019. Final Written Statement Responses: Whale Tail Pit — Expansion Project. Submitted to Nunavut Impact Review Board.</p>	Baffinland presented findings of 0.5 m dustfall pilot at Terrestrial Environment Working Group in December 2023. Baffinland expressed that they are discontinuing the 0.5 m pilot and continuing with the industry standard height given the results of the pilot. Meeting minutes from the December 2023 TEWG will be included in the 2023 Annual Report.
QIA 2022 NIRB M&AE# 1.	Baffinland commits to providing updates on the permanent crossing plan at 20 fish-bearing crossing locations along the Tote Road, and will inform QIA of any permanent corrective actions along the Tote Road on Inuit Owned Land via the submission of an application under the Tote Road Adjustment Notice (TRAN).	Baffinland provided QIA updates on the permanent crossing plan at 20 fish-bearing crossing locations along the Tote Road, and will continue to provide information and solicit feedback as plans progress. Ten (10) of the twenty (20) sites will have round corrugated steel pipe (CSP) installations, with final designs at the remaining ten sites yet to be determined. Construction began in February 2024 at two of the sites where round CSPs will be installed, with construction at the remaining eight sites expected to occur prior to freshet in spring 2024. Baffinland submitted a Tote Road Adjustment Notice (TRAN) for these corrective actions.

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QIA 2022 NIRB M&AE# 18.	The design of the sediment quality sampling program will be evaluated and discussed annually with the MEWG, however, at this time Baffinland anticipates the monitoring of sediment at SW-1 through SW-4 will continue as an annual activity.	In 2023, Baffinland committed to monitoring for sediment and benthic infauna at stations SW-1 through SW-4 as an annual activity for a minimum of three years after the initial use of large ore carriers (Baby Cape and Capesize) (Commitment 10 from the Sustaining Operations Proposal in response to QIA-ME-(3)). Following the three-year period, Baffinland will consider a reduced frequency in sampling at these locations (once every three years) if sediment and benthic conditions at these sites are shown to be stable and within the limits of impact predictions. As Capesize carriers called to Milne Port during the 2023 shipping season for the first time, Baffinland undertook monitoring for sediment and benthic infauna at stations SW-1 through SW-4 in addition to the normal sampling stations. Continued monitoring at these stations is planned for the 2024 shipping season.
QIA 2022 NIRB M&AE# 20.	<p>The field teams conducting the sampling in 2023 have already been instructed to refocus sampling effort to angling, gillnetting and hoop nets in an effort to increase sample size for statistical power. If logistically possible, the sampling taking place in 2023 will endeavour to reach 12 gillnets in each area which was determined to be sufficient for detection of 20% reduction in numbers of Arctic Char or total of all fish species combined, and 40% reduction in Fourhorn Sculpin. In 2022, the monitoring program conducted 10 gillnet sets in the Direct Project Footprint area and 12 sets in the Indirect Project Footprint. Angling (jigging) in 2022 approached the number of sampling events required to detect 40% reduction in all species combined (8 events in each of the Direct and Indirect Project Footprint areas), Arctic Char were not captured by angling (jigging), and the model determined that more than 20 events per fishing area would be required to detect 40% change in Fourhorn Sculpin; in 2022, there were 8 fishing events in the Direct Project Footprint and 5 in the Indirect Project Footprint, so increasing these to 20 events per area may not be logistically feasible. Hoop net sampling will be increased, but may not achieve the levels estimated for statistical power. In 2022, there were 6 hoop net events in the Direct Project Footprint and 3 in the Indirect Project Footprint. To detect 40% change in all species combined, the power analysis determined 24 events per area would be required. Arctic Char were not captured by hoop nets. The number of hoop net fishing events required to detect 40% change in Fourhorn Sculpin exceeded 24 events and was not modelled.</p> <p>Gillnetting is the fish sampling method most likely to result in mortalities in this monitoring program. As only a small additional effort is required to achieve statistical power, it is expected that little additional fish mortality would occur. Incidental mortalities of Arctic Char that occur in gillnet sampling are currently analysed for the fish health program. Mortalities are unlikely to occur with other fishing methods and additionally those methods are unlikely to capture Arctic Char. In the few cases that mortalities of other species potentially used for food by Inuit have occurred, the fishes were typically juveniles which naturally have a high mortality rate at that life history stage. These small fish, generally only a few centimetres in length, are usually either frozen and sent to the taxonomic laboratory for confirmation of identification, or may be used as bait for the monitoring program.</p>	In 2023, the goal of conducting 12 gillnet sets in each sampling area was not achieved due to weather and logistical issues. A total of 10 gill net sets per sampling area was completed. A power analysis of the 2023 fish sampling results will be included in the 2023 MEEMP and NIS/AIS Monitoring Program report, which will include the statistical power of the related analyses.
QIA 2022 NIRB M&AE# 22.	Baffinland will include results of consultation regarding off-setting options as part of <i>Fisheries Act Authorization</i> Applications and will include any future feedback regarding the implementation and monitoring of those off-setting measures in the Annual Report to NIRB as required.	Two Fisheries Act Authorization Applications for the Steensby Component of the Mary River Project were submitted to DFO in February 2024. Prior to this submission, these applications were provided in draft to QIA for comment. These applications have included the results of consultation on off-setting measures for the Steensby component. Information on consultation will be included in our Annual Report to NIRB.
QIA 2022 NIRB M&AE# 25.	The question of whether hoop nets and Fukui traps are complementary methods is being addressed in the 2023 sampling plan. In the three years of comparative fishing using these two gear types, the hoop nets have consistently outperformed the Fukui traps in terms of catch per unit effort, but the Fukui traps have sampled several fish species that were not detected with the hoop nets. At present it is not possible to determine whether this is the result of the gear type versus an unequal level of effort (for example, in 2022, there were 1,852 net-hours	The question of whether hoop nets and Fukui traps are complementary methods was considered annually from 2020 to 2022, under a commitment to conduct three years of comparative fishing using these two gear types. The factors under consideration were capture rate (catch per unit effort) and the diversity of fish species captured. The 2020-2022 results clearly demonstrated the greater effectiveness of hoop nets, which consistently outperformed the Fukui traps in terms of catch per unit effort (noting

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	<p>fished by Fukui traps but only 669 net-hours by hoop nets). In 2023, it is planned that the two gear types will be fished at more equitable levels of effort to allow for an unbiased comparison of their effectiveness for sampling fish biodiversity at Milne Inlet.</p>	<p>that Fukui traps captured several species that were not caught in hoop nets). However, the comparison of the taxa diversity captured by the two gear types was biased by an unequal level of effort. In 2023, the two gear types were fished at more equitable levels of effort (14 fishing efforts of each gear type; 711.5 net-hours for Fukui traps and 720.6 net-hours for hoop nets) to allow for an unbiased comparison of their effectiveness for sampling fish biodiversity at Milne Inlet. These results will be presented in the 2023 MEEMP and NIS/AIS Monitoring Program report.</p>
QIA 2022 NIRB M&AE# 28.	<p>Baffinland acknowledges that the revised Terms of Reference (TOR) were not submitted to the NIRB by December 15th, 2022 as stated in the reviewer’s detailed comment. This submission has been delayed to ensure that member and observer feedback is effectively incorporated into the TOR and the majority of parties are satisfied with the revisions prior to final submission.</p> <p>Baffinland released an initial revised TOR to the MEWG on August 22nd, 2022. On August 23rd, 2022, Baffinland requested that all members and observers submit their comments on the initial draft by September 30th, 2022. Comments were not received from all parties until February 9th, 2023, which prevented Baffinland from meeting the timeline that had previously been committed to. Baffinland requested to meet with multiple organizations following their review of comments on the initial TOR draft to ensure that feedback was understood and to allow for improved revisions on the second draft. Only two observer groups, Oceans North (ON) and World Wildlife Fund (WWF), agreed to meet with Baffinland to discuss their comments.</p> <p>The second revision of the TOR, which incorporated member feedback received on the first draft, was released to the MEWG on April 3rd, 2023. This version also served as the initial draft for the revised TEWG TOR. This draft included a Table of Concordance, which provided an explanation as to why certain feedback was not incorporated into the second draft. The original intention was to submit the second draft to the NIRB, however, Baffinland hosted a combined MEWG/TEWG teleconference on April 19th, 2023 from 1:00 – 4:00 pm to further discuss comments on this draft and concerns were raised regarding this submission. Members felt as though parties could reach a better agreement by developing a third draft for subsequent review. Baffinland agreed to accommodate this request and committed to developing a third draft for member review, which has not been released at the time of this submission. Members and observers were asked to submit their comments to Baffinland on the second draft by May 1st, 2023. This deadline was extended until May 5th, 2023 to further accommodate members and observers with competing priorities.</p> <p>The aforementioned engagements with the Working Groups indicate that Baffinland is communicating effectively by responding to concerns of members and observers to ensure that the desired outcomes and expectations related to the TOR are achieved. Additionally, Baffinland has extended the TOR revision process in an effort to develop a draft that is agreed upon by the majority of members and will allow for improved functionality of the Working Groups, where monitoring and learnings can be discussed.</p> <p>With regards to adaptive management, Baffinland developed a draft Adaptive Management Plan (AMP), which was submitted to the NIRB on May 15th, 2023. Members and observers from both the MEWG and TEWG are able to provide comments on the draft AMP through the NIRB public registry. NIRB registry file no., application no., and identification no. for this document were provided to the Working Groups via email on June 9th, 2023 (08MN053, 125710, and 344993, respectively). The AMP highlights Baffinland’s Adaptive Management Response Framework, including the development of low, moderate, and high action level responses, as well as a summary of how adaptive management has been integrated into Baffinland’s various Management Plans, which are used to guide monitoring and on site activities. Baffinland will continue to use adaptive management to inform decisions and encourages members and observers on the Working Group to address any concerns on the current Adaptive Management Framework through the NIRB registry process.</p>	<p>The last draft Terms of Reference (TOR) circulated to the Working Group was the April 3rd, 2023 draft, which members provided comments on by May 5th, 2023. Baffinland has since revised the TOR to incorporate member feedback as much as possible, but the most recent draft is still under internal review and has not been submitted to the NIRB.</p> <p>At the December 11th & 12th, 2023 MEWG meetings, members requested to see the final draft TOR prior to submission to the NIRB. Members will go through the changes and will be able to ask questions at an upcoming meeting scheduled in April to go over the TOR .</p> <p>Baffinland aims to have the final TOR submitted to the NIRB in early Q2 of 2024, and will then work with MEWG members to secure an independent chair as soon as possible.</p> <p>With regard to Baffinland’s Adaptive Management Plan (AMP: NIRB registry file no. 08MN053, Application no. 125710, and Identification no. 344993), the final version will be appended to the 2023 NIRB Annual Report in Q2 of 2024.</p>

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QIA 2022 NIRB M&AE# 32.	<p>Baffinland continues to make efforts to improve uptake in the Marine Mammal Observation Network (MMON) program for the 2023 shipping season. Baffinland informed vessel captains for re-supply vessels and fuel tankers of the MMON program on July 20th, 2023 and provided the necessary training documents and data sheets to participate in the program. Re-supply vessels and fuel tankers have not actively been included in the MMON program to date, as their voyage routes may differ due to community visits prior to/following transits to Milne Inlet. Baffinland recognizes that participation of these vessels requires oversight from NSSI and Petro-Nav upper management and is not guaranteed.</p> <p>Additionally, Baffinland provided MMON program materials to crews on board both of the tugs (Ocean Taiga and Ocean Tundra) on July 20th, 2023. Both crews confirmed their participation in the 2023 MMON program on July 25th, 2023 via email. Program materials were also provided to bulk carriers on July 20th, 2023 and participation in the 2023 MMON program was confirmed. The MSV Botnica, as well as the MSV Fennica (Baffinland’s 2023 contingency ice breaker) confirmed their participation in the 2023 MMON program on July 20th, 2023. Baffinland acknowledges that crew members on board Project vessels are not designated marine wildlife observers and have mandatory duties on board the vessel that supersede participation in the MMON. Participation in this program is voluntary, but strongly encouraged by Baffinland.</p> <p>To aid with program uptake, Baffinland will make efforts to contact vessel captains throughout the 2023 shipping season upon entry into the Regional Study Area (RSA) based on the rolling shipping schedule to remind crews to document wildlife sightings in accordance with MMON. Additionally, Baffinland will inquire with MMON as to whether or not community members can participate in the program and will provide the necessary training documents and data sheets to the Pond Inlet Environmental Coordinator to distribute within the community if permitted.</p> <p>Sighting data collected for the MMON is determined by the Marine Mammal Observation Network, not by Baffinland. All observer members are provided with the same observer chart template and data collection protocol, which does not include behavioural state of marine mammals, but does include the distance and position of the marine mammal relative to the observing vessel. The observation chart includes: observer member name; vessel name; date of observation; time of observation; certification no.; wind speed; visibility; species; number of observed individuals; latitude and longitude of observation location; distance of animal from vessel; position of animal relative to vessel (ie. port vs. starboard); additional comments.</p>	<p>As previously indicated, the behavioural state of marine mammals is not recorded for the Marine Mammal Observation Network (MMON) Program, as the data collection protocol is developed by MMON and consistent for all observation crews. Rather than only contacting vessel captains at the start and end of shipping season, Baffinland made additional efforts throughout 2023 to remind vessel captains of the MMON program throughout the shipping season in attempt to increase program uptake. Program reminders were sent to vessels monthly between July-October. Preliminary results indicate that the number of participating vessels in 2023 increased since 2022, which will be captured in the 2023 NIRB Annual Report.</p>
QIA 2022 NIRB M&AE# 43.	<p>The status for this monitoring endpoint is listed in the revised draft Terrestrial Environment and Mitigation Monitoring Plan (TEMMP; Baffinland, 2023; pg.40-41), submitted to NIRB on May 15, 2023:</p> <ul style="list-style-type: none">4.2.2.1 — Peregrine Falcon and Gyrfalcon <p>Peregrine falcon and gyrfalcon (key indicators for cliff-nesting raptor species) are monitored during Project construction and operation. Monitoring is comprised of aerial survey during the nesting period and before fledging. Nest site occupancy and productivity relative to distance of the nest site to project infrastructure are then modelled to determine potential Project-effects. Monitoring occurred annually between 2005-2020, as outlined in Table 4.2. Based on findings, additional/follow-up investigations were not warranted or recommended.</p> <ul style="list-style-type: none">4.2.2.2 — Common Eider, King Eider and Red Knot <p>Baffinland is supporting baseline research by Environment Climate Change Canada and Canadian Wildlife Services (ECCC-CWS) examining the potential interactions between marine shipping and seabirds (primarily murres). Nest densities for Common Eider, King Eider, and Red Knot were surveyed along the Port Sites and appropriate control shorelines over three consecutive years (2012-2014). Table 4.6 summarizes the goals/objectives, thresholds and scope of monitoring for common eider, king eider and red know nesting.</p>	<p>The SBO program was executed successfully in 2023. Results, inclusive of eider and sea duck sightings, will be included in the final report submitted to the NIRB in Q2 of 2024. An update about the ECCC seabird research conducted at Cape Graham Moore was provided to the MEWG at the December 13th and 14th, 2023meetings held in Iqaluit.</p>

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	<p>Detailed information is provided in Appendix C-5B — Migratory Bird Monitoring: Shipping Activity on Seabirds and Seaducks. <u>Based on findings, additional/follow-up investigations were not warranted/recommended.</u></p> <p><u>Reference:</u></p> <p>Baffinland Iron Mines Corporation (Baffinland), 2023. Terrestrial Environment Mitigation and Monitoring Plan. Ref. No. BAF-PH1-830-P16-0027, DRAFT. May 15, 2023.</p>	
QIA 2022 NIRB TE# 4.	<p>Baffinland appreciates this recommendation and will consider it in its ongoing collaboration with the Government of Nunavut on caribou monitoring. It should be noted, however, that the GN has previously expressed at TEWG meetings that increasing incentives is not a preferred method to increase program participation.</p>	<p>Baffinland consulted with the Government of Nunavut (GN) on caribou monitoring and is continues to collaborate with them. With respect to offering incentives for a tissue-sampling program, the GN indicated that increasing the incentive is not a preferred approach to increasing program participation. Therefore, Baffinland’s caribou tissue collection program aligns with what the GN previously provided for the same samples.</p>
QIA 2022 NIRB TE# 6.	<p>Multiple indicators and approaches are being applied for surveillance monitoring of mammals at the Project. While the reviewer comment states that Baffinland has disregarded concerns by repeatedly pointing to low regional abundance as the primary reason why caribou are not being observed—this cannot be dismissed. North Baffin caribou are currently at a low point in their 60 to 80-year population cycle (Government of Nunavut, 2019), and caribou observations are recorded infrequently, incidentally or during surveys. The current survey approaches and frequency are appropriate for low caribou densities; if/when caribou densities increase the frequency of survey will be increased correspondingly. Baffinland acknowledges that an aerial survey was conducted in March of 2023, which will provide an updated abundance estimate for caribou populations within the vicinity of the Project, and ultimately allow Baffinland to modify study designs for caribou monitoring programs in the future, if warranted.</p> <p>All methods and approaches were, in fact, developed with input from the TEWG.</p> <p>Refer to response # 2 (GN AR #02) regarding additional studies and thresholds used to inform more targeted survey to determine potential impacts on caribou would be triggered if/when caribou densities increase.</p>	<p>Baffinland highlights the considerable efforts made to expand caribou monitoring in 2023, including completion of a caribou aerial survey (not conducted at the Project since 2012). Based on outcomes of this survey, Baffinland has engaged with the GN for potential development of a caribou collaring and caribou tissue sampling program on Northern Baffin Island. QIA will put forward a recommendation to run a collaring program at the next TEWG meeting of 2024.</p>
QIA 2022 NIRB TE# 8.	<p>Experimental design parameters (and limitations) are described in the 2022 Terrestrial Environment Annual Monitoring Report (TEAMR; EDI, 2023; refer to 10.4 Remote Cameras, 10.4.1 Methods; pg.226-227). Analysis of field of view (aspect/orientation, coverage) was completed in 2021 and reported in Section 9.4 and Appendix E the 2021 TEAMR (EDI, 2022). The proposed suggestions will be considered as part of future reporting.</p> <p>References:</p> <p>Environmental Dynamics Inc. (EDI), 2022. 2021 Mary River Project Terrestrial Environment Annual Monitoring Report - Prepared for Baffinland Iron Mines Corporation. April 2022.</p> <p>Environmental Dynamics Inc. (EDI), 2023. 2022 Final Mary River Project Terrestrial Environment Annual Monitoring Report - Prepared for Baffinland Iron Mines Corporation. April 28, 2023.</p>	<p>The current/ongoing remote camera program was discussed at the December 13th and 14th, 2023 Terrestrial Environment Working Group (TEWG) meetings. The camera models are Reconyx9000s and the detection range is 500 ft. The discussion can be found on p. 14 of the final minutes, which will be appended to the 2023 NIRB Annual Report.</p>
QIA 2022 NIRB TE# 10.	<p>The Remote Camera program was developed with input from the Terrestrial Environment Working Group (TEWG).</p> <p>Sites 1, 3, 4, 6, 10 and 16 were selected to provide a regular distribution along/at the Project. Methods/experimental design are appropriate for current regional low-density of caribou. Refer to 2023 TEAMR, Map 10-2 (EDI, 2023; pg.224), shown below.</p> <p>Based on monitoring outcomes to date, additional Trap Camera deployment is not warranted.</p> <p>References:</p>	<p>The agenda items for the December 13th and 14th, 2023 TEWG meetings included (1) Summary of Terrestrial Monitoring Work Completed in 2023 and (2) Question and Answer Period Related to the 2022 NIRB Annual Report/Terrestrial Environment Annual Monitoring Report. No concerns were raised by the TEWG, which includes HTOs from the five communities of interest (COI), with regard to the remote camera-monitoring program.</p>

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	<p>Environmental Dynamics Inc. (EDI), 2023. 2022 Final Mary River Project Terrestrial Environment Annual Monitoring Report - Prepared for Baffinland Iron Mines Corporation. April 28, 2023.</p> 	
<p>QIA 2022 NIRB TE# 16.</p>	<p>Current mitigation plans state that there is a known Snow Goose moulting area south and west of the Mary River Deposit No. 1. This area has moulting geese, and consequently flight restrictions apply in July and August. During this timing window, helicopters are required to maintain 1,100 m above ground level vertical and/or 1,500 m horizontal distance from observed concentrations of migratory birds. Pilots are required to keep an eye out for groupings of birds and avoid them to the extent possible.</p> <p>Baffinland encourages the QIA to share a recommended study design to better understand what research is being proposed. Baffinland acknowledges that conducting research in the snow goose moulting area would only warrant the additional use of helicopters, further contributing to flights within the snow goose moulting area, and at low levels below the 1,100 m threshold during mandatory research program activities such as slinging, personnel drop-off/pick-up, data collection at various site locations. Baffinland is currently not planning any research on the effect of non-compliance with rationale flights on migratory bird breeding and snow geese moulting.</p> <p>Acceptable rationale for low-level helicopter flights was discussed in a helicopter flight specific meeting on January 5, 2023 between Baffinland/EDI and the GN, and again at the TEWG meetings on February 14 -16, 2023. Amendments to helicopter overflight definitions and</p>	<p>The revised table of acceptable rationale for low-level helicopter flights was applied during the 2023 Helicopter Overflight Monitoring Program. Baffinland and QIA met bilaterally on November 20th, 2023, which included a discussion related to the behavioural monitoring of snow geese. BIM engaged with ECCC technical experts following this bilateral meeting to determine whether behavioural monitoring within the snow goose moulting area was deemed necessary, and whether a discussion should be held with the TEWG. ECCC indicated that the organization believed this additional monitoring was not warranted at this time based on results to date.</p>

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	<p>reporting requirements, including acceptable rationale for low level flights (ie. compliant with rationale) developed during these meetings/discussions will be applied to all conclusions regarding compliance. The revised table of acceptable rationale for low-level flights was included as Attachment 1 in Appendix E of the 2022 NIRB Annual Report (Baffinland, 2023), which was made available for public comment, inclusive of TEWG members and the QIA.</p> <p>Baffinland updated their helicopter overflight caribou mitigation procedure in June 2023 to reflect resolutions and discussions with GN and QIA from the meetings earlier in 2023.</p> <p><u>References:</u></p> <p>Baffinland Iron Mines Corporation (Baffinland), 2023. 2022 Annual Report to the Nunavut Impact Review Board. April 30, 2023.</p>	
QIA 2022 NIRB TE# 17.	<p>Baffinland is open to discussing potential changes to HOL survey locations, but requires the QIA to propose alternative locations that they deem satisfactory, with supporting justification as to why the proposed locations are more suitable than the current locations. As discussed in responses #66-67 (QIA 2022 NIRB TE# 10-11), HOL locations were established jointly with the TEWG, inclusive of MHTO and QIA. Stations are currently positioned at the highest points on land to ensure optimal conditions for data collection. The 2023 HOL program, including station locations, was discussed at the February TEWG meeting and no concerns regarding the proposed surveys were raised by the QIA or other TEWG members. The purpose of sharing tentative studies for the following monitoring season during these Working Group meetings is to receive and incorporate member feedback into the study design, and ensure that the study design is deemed adequate by the Working Group. If members are unable to provide program modification suggestions, and substantiated statements for those proposed modifications, then Baffinland will continue with the current study design for monitoring programs that were previously determined with the TEWG.</p>	<p>Baffinland has not received any alternative HOL locations from QIA at the time of this submission. Completed 2023 terrestrial monitoring programs, inclusive of the HOL surveys, were discussed at the December 13th and 14th, 2023 TEWG meetings and no concerns were raised relating to HOL survey locations. These minutes will be appended to the 2023 NIRB Report.</p>
QIA 2022 NIRB SE# 3.	<p>Baffinland will explore means to increase survey response rate, which may take form as a nominal incentive. Baffinland will discuss this item before implemented with the Mary River Scoio-Economic Working Group, which the QIA is a member of, and report on any incentive(s) used in 2023 in the Company’s 2023 reporting period.</p>	<p>Baffinland administered the annual Inuit Employee Survey during the period of October 23 to December 1, 2023. In total, Baffinland collected 81 responses to the survey, representing a response rate of 22%. This represents an increase from an 18% response rate (55 surveys completed) achieved in 2022.</p> <p>During the September 2023 MRSEMWG meeting, Baffinland asked working group members to provide suggestion on how survey response rate can improve. The QIA suggested that Baffinalnd provide incentive as well as the administration of the survey in the five North Baffin communities and Iqaluit. Baffinland actioned these suggestions from the QIA, and it is believe these factors contributed to the increase in response rate. Details will be outlined in the 2023 Annual Report.</p>
QIA 2022 NIRB SE# 8.	<p>Baffinland disagrees with the assertion that there is a compliance issue here. Baffinland continues to work to reduce barriers between employees of different cultures and languages. Initiatives implemented to proactively address direct and indirect effects are discussed in the methods section of PC Term and Condition No. 142 (p. 493). In the spirit of continuous improvement, however, Baffinland is open to working with the QIA to determine the next Workplace Conditions Review, with the intent to provide a more current understanding of any potential issues in this area in an effort to identify the need for additional actions.</p> <p>Baffinland administers its Inuit Employee Survey on an annual basis, where Mary River Socio-economic Monitoring Working Group members, including the QIA, are provided opportunity to review and provide feedback on said Survey. In 2022, Baffinland did not receive comment from the QIA on the Survey. Baffinland has circulated the draft 2023 Inuit Employee Survey it plans to administer to working group members for review and comment. Baffinland looks forward to reviewing QIA input on the 2023 Survey.</p>	<p>Baffinland circulated the draft 2023 Inuit Employee Survey with MRSEMWG members for comment. Baffinland received a series of suggested edits from the QIA in 2023. Suggested edits included minor revision to wording of questions, increasing answer options respondents can select from, and inclusion of an additional question regarding community wellbeing. Baffinland integrated suggested edits into the finalized 2023 Inuit Employee Survey, including inclusion of a new question (i.e., question #24).</p>

Original Cmt. #	Baffinland’s Original Response	Baffinland Update (Q1 2024)
DFO 02	<p>1. Potential introductions of non-indigenous species are taken very seriously by Baffinland. Identification of taxa that had not been identified during baseline sampling does not indicate that the taxon is not native to the region, only that it was not previously detected. Since the biodiversity of the eastern Canadian Arctic is not well studied, it is likely that the intensive monitoring conducted by Baffinland will detect species not previously sampled from the region. To date, approximately 880 taxa of marine animals and plants have been detected by Baffinland’s monitoring program. Each newly detected taxon is investigated to determine if it represents a native species, non-indigenous species or an aquatic invasive species that would require a response. The scientific literature is searched for geographic range data for the taxon and if it has a history of invasion. From this investigation, each taxon is characterized by its worldwide geographic distribution and its risk of invasion. Only species that are determined to be non-indigenous and pose a high risk of invasion will be placed on the Trigger List and require a response plan. No species have been placed on the Trigger List therefore no response plans have been required or prepared. Some taxa have been placed on a Watch List which simply means an enhanced level of monitoring, so that the taxon is being watched to make sure it is not showing any signs of invasiveness, or because the identification of the taxon may require additional verification. In the event that non-indigenous species were shown to become established in the environment with the potential for effects on the environment, expansion of the current program to incorporate additional studies of effects would be considered in development of the response plan.</p> <p>Baffinland’s management of shipping to prevent introduction of aquatic invasive species exceeds what is currently required by Transport Canada or international standards. Vessels are required to conduct ballast water exchange followed by ballast water treatment if a treatment system is onboard. At this time, all Baffinlnad vessels scheduled for the 2023 season are anticipated to have a treatment system on board. Baffinland will consider all future technological or operational improvements that mitigate or reduce introductions of non-indigenous species. In 2023, Baffinland is collaborating with DFO to undertake a biological ballast water study of vessels arriving at Milne Port and will reassess its risk assessments once that study is completed.</p>	
	<p>2. The only targeted sampling that could not be completed in 2022 (due to timing restrictions related to weather) was sampling to collect additional genetic material for analysis. Targeted sampling to assess organism abundance and distribution was completed as planned. The proposed examination of 2021 samples was intended to provide additional specimens to taxonomic specialists. All samples are scanned in their entirety for rare taxa when they are originally processed in the laboratory, but specimens are not necessarily extracted unless there is an identified need for them. In this case, it was expected that additional specimens would be available in 2022 but this turned out not to be the case, therefore the 2021 specimens were not removed at the time of sorting.</p>	
	<p>3. <i>Marenzelleria wireni</i> and <i>M. arctia</i> are Arctic species and their recorded distribution includes areas to the east and west of the Canadian Arctic although they had not been sampled in Canada. In the case of <i>M. arctia</i>, the Canadian Arctic Expedition of 1913-1918 detected 150 km west of the Canadian border, in Alaska. The expert opinion of Dr. Vasily Radashevsky, a specialist in the global distribution and biogeography of <i>Marenzelleria</i> species and related polychaete worms, is that Canada is part of the native distribution of both <i>M. wireni</i> and <i>M. arctia</i>. Historical collections of <i>Marenzelleria</i> in the Eastern Canadian Arctic that have been reported in the scientific literature have identified those specimens as <i>M. viridis</i> but this appears to be incorrect, as has previously been acknowledged by DFO. The likelihood is that these misidentified specimens represented one of the known Arctic species. Update to include new information</p>	
	<p>4. The 2023 zooplankton sampling program will include sampling events during the open water season, with an additional sampling event added in September to improve temporal variability. An additional sampling location has also been added to improve spatial variability. As indicated by the reviewer, this study design was discussed and approved by DFO.</p>	
	<p>5. Water quality monitoring in place for 2023 does not specifically address the neutralization or release of chlorinated water from vessels, but would detect any salinity anomalies or other water quality changes in the vicinity of the ore dock during the monitoring period.</p>	<p>1. The statement in the 2022 MEEMP report that <i>Marenzelleria wireni</i> was previously known from Milne Port was poorly worded and referred to the <i>Marenzelleria</i> detections in the Port since 2016. Both <i>Marenzelleria wireni</i> and <i>M. arctia</i>, the two species that were detected through MEEMP monitoring at Milne Port, are on record as occurring elsewhere in the Canadian Arctic. The expert opinion of Dr. Vasily Radashevsky, a specialist in the global distribution and biogeography of <i>Marenzelleria</i> species and related polychaete worms, is that Canada is part of the native distribution of both <i>M. wireni</i> and <i>M. arctia</i>, and this is supported by records in the scientific literature and in museum collections of these species in the Canadian Arctic. <i>M. wireni</i> was collected in Lancaster Sound and in Scott Inlet on the northeastern coast of Baffin Island in 1979 (Thomson and Cross 1980; Thomson 1982). <i>M. arctia</i> was detected in surveys conducted in 1980 and 1986 in Tuktoyaktuk Harbour and Mason Bay, NT (Hopky et al. 1994; Canadian Museum of Nature collections), and the first description of <i>M. arctia</i> was from specimens collected in 1913 by the Canadian Arctic Expedition at Collins Point, Alaska (Chamberlin 1920). Specimens of both <i>M. wireni</i> and <i>M. arctia</i> collected from multiple locations along the Alaska shoreline of the eastern Beaufort Sea in the 1970s are held by the California Academy of Sciences. As native species, no response plan is required for <i>M. wireni</i> or <i>M. arctia</i>.</p> <p>2. The 2023 zooplankton sampling program included three sampling events during the open water season (31 July to 1 Sept) to improve temporal variability. An additional sampling location was added, expanding the number of samples to six oblique tows and six vertical tows per sampling event to improve spatial variability. As indicated by the reviewer, this study design was discussed and approved by DFO.</p> <p>3. Baffinland collaborated with DFO to sample the ballast water of arriving ore carriers and examine the performance of a ballast water biological monitoring technology that was trialed at Milne Port in Sept/Oct 2023. Biological monitoring at Ragged Island was not possible in 2023 due to heavy ice conditions preventing safe travel/access to this area.</p>

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	<p>6. Vessels engaged by Baffinland are in possession of an International Anti-Fouling System Certificate, which is a mandate of the International Convention on the Control of Harmful Anti-Fouling Systems on Ships and certifies that the vessel’s anti-fouling system meets requirements. All required documentation is reviewed by the Fednav boarding clerks during post-arrival formalities at Milne Port.</p> <p>7. Taxa were identified to the lowest taxonomic level that could be reliably identified with the specimens collected. <i>Myrianida</i> sp., despite the specimens being unidentifiable at the species level, is classified as ‘no risk’ because there are collection records of <i>Myrianida prolifera</i> throughout the Canadian Arctic including Iqaluit, Churchill and Ungava Bay, and the one species of <i>Myrianida</i> with a history of introduction is native to Australia and the Indo-Pacific and the places where it is NIS are Florida, California and Ha’waii. Similar lines of evidence were used to assess the other taxa with respect to their geographic distribution and risk classifications. Further review of species may entail one or more of several steps necessary for evidence-based assignment of a geographic and risk classification: independent verification of taxonomic identification, review of the literature and expert opinion(s) about the distribution and ecology of the taxon, and/or targeted field collection of additional specimens for identification and population tracking. In 2023, there will be a new collaboration started with an expert in the taxonomy and biogeography of Canadian Arctic macroalgae.</p> <p>8. Numbers representing the ecoregions where taxa have been recorded can be added to the 2023 report. At the moment, the earliest zooplankton baseline data we are aware of were collected in 2014, but should any earlier data be located an additional column could be added to Table 8-7.</p> <p>9. There are no recorded NIS or AIS within the genus <i>Ampharete</i>. This is a widespread genus recorded from the Canadian Arctic, but most specimens were collected and identified in the 1980s and the species <i>Ampharete petersenae</i> was more recently described, in 1997. Potentially some of these specimens from the earlier collections would be classified today as <i>A. petersenae</i>. Representatives of the species have been reported in areas adjacent to the Canadian Arctic.</p> <p>10. Where logistically possible, split samples are being preserved in both formaldehyde and ethanol in 2023, to allow for DNA barcoding of specimens as well as traditional microscopic techniques of identification. It is hoped that this approach will augment existing DNA libraries.</p> <p>11. Please see response to item 3, above.</p> <ul style="list-style-type: none">○ As noted above under item 2, the targeted sampling that was not conducted in 2022 was the collection of ethanol-preserved samples for DNA analysis. Targeted sampling to detect trends in population abundance and distribution was carried out as planned.○ Considering distribution in the Canadian Arctic as a whole, there are records of the genus <i>Marenzelleria</i> from at least four locations, including specimens identified as <i>Marenzelleria viridis</i> and described as a characteristic species of nearshore waters of Gjoa Haven and Banks Island, found on sandy bottoms in depths<10m (Brown 2007; Brown et al. 2011). Baffinland agrees that identifications of <i>Marenzelleria viridis</i> in the Canadian Arctic are likely to be misidentifications at the species level but consider these reliable at the genus level. It is likely that such specimens represent one of the Arctic species in the genus <i>Marenzelleria</i>. <p>Baffinland is collaborating with DFO to examine the performance of a ballast water biological monitoring technology to be trialed at Milne Port in Sept/Oct 2023. The ROV surveys previously conducted did not achieve the objectives of the surveys as they were not able to provide imagery that was adequate to identify hull fouling organisms at a taxonomic resolution suitable for evaluating risk. Ragged Island sampling is planned for 2023, but as in all years it is subject to logistical feasibility (e.g., weather, ice conditions, or equipment delays to the monitoring program).</p>	

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	<p>Figure 8-6 was included for illustrative purposes only and was sourced from ArcOD. It is not meant to represent the datasets that were accessed for this project, which are listed in the report.</p> <p>The criteria for distribution categories were based on those used by Goldsmit et al. (2014), however, Baffinland will re-examine these relative to biogeographic and circulation knowledge.</p> <p><u>References:</u></p> <p>Brown, T.M. 2007. Benthic biology of two near-shore Arctic locations, and potential impacts of sea level change, coastal erosion, and climate change. M.Sc. Thesis, Biology, Memorial University of Newfoundland, 139 p.</p> <p>Brown, T.M., Edinger, E.N., Hooper, R.G., Belliveau, K. 2011. Benthic marine fauna and flora of two nearshore coastal locations in the western and central Canadian Arctic. Arctic 64(3): 281-301.</p> <p>Chamberlin, R.V. 1920. Canadian Arctic Expedition 1913-1918. Vol. IX: Annelids, parasitic worms, Protozoa, etc. Part B: Polychaeta. King's Printer, Ottawa. 41p.</p> <p>Goldsmit, J., Howland, K.L., and Archambault, P. 2014. Establishing a baseline for early detection of non-indigenous species in ports in the Canadian Arctic. Aquatic Invasions 9: 327-342.</p> <p>Hopky, G.E., Lawrence, M.J., and Chipertzak, D.B. 1994. NOGAP B2: Data on the meio- and macrobenthos, and related bottom sediment from Tuktoyaktuk Harbour and Mason Bay, N.W.T., March, 1985 to 1988. Canadian Data Report of Fisheries and Aquatic Sciences 939: 297 p.</p> <p>Thomson, D.H. 1982. Marine benthos in the eastern Canadian high Arctic: Multivariate analyses of standing crop and community structure. Arctic 35: 61-74.</p> <p>Thomson, D.H., and Cross, W.E. 1980. Benthic and intertidal studies in Lancaster Sound, northwest Baffin Bay and adjacent waters: final report. L.G.L. Ltd. for Petro-Canada. August 1980.</p>	
PC 03	<p>Parks Canada requested that Baffinland “clearly define the trends and what triggers a response”.</p> <p>Baffinland will add this as an agenda item to the next MEWG meeting in 2023 so that all MEWG members are clearly aware of the adaptive management and response triggers in the marine mammal TARP.</p>	<p>Baffinland included this as a topic at the December Marine Environment Working Group (MEWG) meeting but it was deferred due to time constraints. This topic will be added in 2024 so that all MEWG members are clearly aware of the adaptive management and response triggers in the marine mammal Trigger, Action, Response Plan (TARP).</p> <p>Please note that the Draft Marine Monitoring Plan (MMP), inclusive of the TARP, as well as the Draft Adaptive Management Plan (AMP) were circulated to the MEWG in Q2 of 2023 for public comment. Baffinland provided a response to all comments within 30 days of receipt.</p>
PC 18	<p>The water quality assessment as stated in the report objectives is focussed on the evaluation of water quality in the receiving environment downstream from site discharge points MP-05 and MP-06 (4 stations per discharge point sampled 5 times). Therefore, both spatial and temporal variability are captured downstream of each discharge point by the sampling program. Summary statistics were calculated and data screened against applicable water quality guidelines to identify parameters of potential concern. These parameters of potential concern were then evaluated further (e.g., through the interpretation of graphs). The 2016 data were not included in the graphs because of limitations due to elevated detection limits prior to 2017.</p> <p>For the 2023 MEEMP Report, consideration will be given to the presentation of exceedances in tabular format as suggested by the reviewer. Given that 7 years of data are now available that are not affected by elevated detection limits, consideration will also be given to the application of statistical analysis in reporting to address the objectives of the water quality monitoring program.</p>	<p>In the 2023 MEEMP and NIS/AIS Monitoring Program annual report, which has not yet been released at the time of this submission, data were tabulated to allow for presentation of exceedances as suggested by the reviewer. Given that 7 years of data are now available that are not affected by elevated detection limits, statistical analysis was applied in reporting to address the objectives of the water quality monitoring program.</p>

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CIRNAC 3	<p>a. CIRNAC notes that the proportion of PAG waste mined in 2022 was well over what was anticipated for the life of mine, and indicates this warrants a comment on LOM tonnage estimates of PAG waste rock. However, annual variability is and should be expected when comparing against LOM averages, and a relatively higher percentage of PAG mined in 2022 does not indicate concern with LOM estimates. Noteworthy, Baffinland does recognize the value in reconciling waste mined vs modelled over a multi-year period and has already planned to complete this exercise. Baffinland will prepare a memo on waste reconciliation for material mined between 2014 and 2022, and will provide this to regulators no later than June 30th 2024.</p> <p>b. Baffinland is currently working with a third party consultant to update its Phase 1 Waste Rock Management Plan and this update will include reporting and analysis of collected data to evaluate the WRF performance. This update will be completed by no later than December 31, 2023.</p> <p>c. Baffinland will provide a full update to the Phase 1 Waste Rock Management Plan by no later than December 31, 2023, and this update will address the following recommendations:</p> <ul style="list-style-type: none">○ <i>Review of the 0.2% total sulphur threshold as an analogue for a Neutralization Potential Ratio (NPR) of 2, and to consider the implications of an absence of calcium or magnesium carbonate mineral content and the associated Neutralization Potential (NP) in the waste rock</i>○ <i>Perform a sensitivity analysis around the effect of uncertainty in the 0.2% total sulphur threshold</i> <p>d. All point sources with potential ARD are monitored through the site SNP and/or CREMP monitoring programs. As part of those monitoring programs, any anomalous data or data outside of pre-established thresholds triggers an investigation into the cause (Trigger Action Response Plan or TARP). This includes parameters associated with ARD.</p> <p>e. As no TARP has been triggered with regard to these facilities or these parameters, Baffinland will not be looking specifically into temporal or spatial trends. This request is essentially arbitrarily changing Baffinland’s Water Licence and associated Management Plans without public review. Baffinland would be happy to revisit this idea during the Water Licence renewal process.</p>	<p>Baffinland provided the updated Waste Rock Management Plan for 2023-2026 in January 2024, to CIRNAC. Baffinland is also on track to provide the memo as committed previously by June 30, 2024.</p>
CIRNAC 11	<p>a. CIRNAC’s question/concern regarding the removal of “10 dustfall monitors” is unsubstantiated and appears to be unrelated to the 2022 TEAMR. Baffinland welcomes alternate dialogue to clarify this assertion.</p> <ul style="list-style-type: none">○ Four (4) dustfall monitors were installed along the proposed Phase 2 railway route to collect baseline dustfall data. All four dustfall monitors were discontinued when the Phase 2 project application was rejected.○ Six (6) non-conventional 0.5 m dustfall monitors were installed in tandem with six (6) standard-sized 2.0 m dustfall monitors as part of a comparative trial. All of these dustfall monitors (0.5 m and 2.0 m) presently remain in place and operational. A forthcoming memo, anticipated in fall 2023 will summarize outcomes of this dustfall monitoring trial and recommendations. The memo will be shared with all applicable stakeholder and regulatory groups. <p>b. Not applicable; refer to Part a response (above).</p> <p>c. Refer to Response #1 (CIRNAC #1)</p> <ul style="list-style-type: none">○ Baffinland already monitors and investigates potential trends in increased dustfall generation with soil contamination in the various mine site areas. A long-term vegetation and soil base metals monitoring program was initiated in 2012, as described in the Terrestrial Environment Mitigation and Monitoring Plan (TEMMP) (Baffinland, 2016). The objectives of the vegetation and soil base	<p>EDI issued a technical memorandum for a pilot study comparing the 0.5 m dustfall canister results to the standard 2.0 m canister results. This memo was circulated to the TEWG via email on December 13th, 2023 by Baffinland’s Environmental Monitoring Specialist. Results concluded that there was no significant difference between sampling results and sampling at the 0.5 m height was not required. Baffinland indicated (both in the 2022 NIRB Annual Report and during the December 2023 TEWG meeting) that the pilot study would be discontinued; TEWG members shared no objections to this affirmation (refer to p. 84 of the 2022 NIRB Annual Report and p. 30 of the December 2023 TEWG minutes, to be appended to the 2023 NIRB Annual Report).</p>

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	<p>metals monitoring program are to monitor metal concentrations in vegetation and soil, particularly caribou forage (i.e., lichen), and verify that metal concentrations are within the acceptable range for established soil quality guidelines and relevant vegetation indicator values.</p> <ul style="list-style-type: none">○ The most recent soil-metal concentration data, collected in 2022 at the Project, predominantly indicated no significant change, or concentrations were significantly lower relative to baseline values. Concentrations were below or within an acceptable range for soil-metal concentrations. Further, it was noted that there was a significant negative relationship between metal concentrations in dustfall and metal concentrations in soil for all CoPCs except cadmium; for all CoPCs, this appeared to be mediated by a significant positive relationship with soil pH. No unifying trend has been drawn from the analysis (EDI, 2023). <p>d. Undertaking leachability and geochemical testing is not presently warranted given that soil sampling data collected in 2022 predominantly indicated concentrations were below or within an acceptable range for soil-metal concentrations. The TEMMP/Trigger-Action Response Plan would guide future adaptive management response “If monitoring indicates increasing concentrations of metals over time”.</p> <p><u>References:</u></p> <p>Baffinland Iron Mines Corporation (Baffinland), 2023. Terrestrial Environment Mitigation and Monitoring Plan. Ref. No. BAF-PH1-830-P16-0027, DRAFT. May 15, 2023.</p> <p>EDI Environmental Dynamics Inc. (EDI). 2023. Mary River Project: 2022 Terrestrial Environment Annual Monitoring Report. Prepared for Baffinland Iron Mines Corporation, Oakville, Ontario, Canada. 426 pp.</p>	